

Annual Business Plan

2021 – 2024

February 26, 2021

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The Financial Services Regulatory Authority of Ontario (FSRA) is an independent regulatory agency. It was established in June 2019 to enhance public confidence in non-securities financial services and pensions in Ontario.

FSRA Vision

Financial safety, fairness and choice for Ontarians

FSRA Mission

Public service through dynamic, principles-based and outcomes-focused regulation

FSRA Values

Honest, Impactful, Credible, Empathetic, Collaborative, Empowered

Executive Summary

The Financial Services Regulatory Authority of Ontario (FSRA or “the Authority”) is pleased to provide its FY2021-2024 Annual Business Plan. It outlines FSRA’s priorities, strategic direction, financial overview and supporting activities.

FSRA is an independent regulatory agency, created to improve consumer and pension plan beneficiary protections in Ontario. The Authority was launched in June 2019 to replace the Financial Services Commission of Ontario (FSCO) and the Deposit Insurance Corporation of Ontario (DICO).

FSRA protects Ontario consumers, which includes the public, credit union members pension plan beneficiaries, investors and other stakeholders. It does so by providing prudential and/or conduct regulation and supervision of:

- property and casualty (P&C) insurance (including auto insurance rates);
- life and health insurance;
- credit unions and caisses populaires;
- loan and trust companies;
- mortgage brokers;
- health services providers (related to auto insurance);
- pension plans; and
- financial planners and advisors (proposed).

The Annual Business Plan focuses FSRA’s activities on achieving regulatory efficiency (including burden reduction)

and effectiveness, while protecting the interests of consumers.

Each of the priorities focus on improving supervision capability, enhancing/implementing regulatory framework components, protecting consumers and/or gaining a better understanding of consumer financial service needs.

The priorities of the credit union, life and health insurance, and mortgage brokering sectors focus on conduct and/or prudential regulation. These are intended to improve sector stability and maintain public trust.

The P&C/auto insurance sector priorities aim to enhance consumer choice, increase transparency, promote innovation, and foster just and reasonable rates and integrity, competition and stability, in the auto insurance marketplace.

Pension oversight will evolve its predictive analysis and capabilities with respect to the Pension Benefit Guarantee Fund (PBGF)-eligible pension plans. The goal is to improve outcomes for pension plan members.

The title protection framework for financial planners and financial advisors (FP/FA) will promote confidence and professionalism in the sector and reduce confusion for investors and consumers. This will happen by establishing minimum standards and leveraging existing licence and designation regimes.

FSRA will also continue to promote a national dialogue on a harmonized approach to regulatory issues in the areas it regulates. To this end, FSRA helps lead this work as a participating member in several forums.

In all sectors, modernizing systems, processes and infrastructure is intended to increase regulatory efficiency and effectiveness. As FSRA evolves, activities and oversight are shifting from the traditional, primarily prescriptive regulation, to a principles-based approach. Financial services and pensions are changing rapidly. There are opportunities to enable innovation and facilitate new entrants to the market.

Ongoing research will identify market and consumer vulnerabilities in the marketplace, helping FSRA to develop new initiatives that support our mandate and vision. FSRA will continue to build its engagement with consumers.

FSRA's FY2021-22 Board-approved budget is \$103.9 million. This represents a \$2.1 million increase over FY2020-21 and includes investments in regulatory enhancements and increased conduct supervision, regulatory effectiveness, digital transformation and facilities. These investments are partially funded by internal cost efficiencies.

FSRA's total sector revenues will increase by \$0.7 million over the FY 2020-21 budget. Fee assessments in variable fee sectors will increase by 1.0 per cent. These increases reflect the credit back to the sectors of \$3.9 million in excess revenues over costs from FY2019-20.

Mandate

The *Financial Services Regulatory Authority of Ontario Act, 2016* (FSRA Act) establishes FSRA's role in regulating non-securities financial services and pensions in Ontario. It sets out powers to administer and enforce the FSRA Act and sector statutes and outlines FSRA's basic governance and accountability structure. FSRA's overarching objects, as defined in the FSRA Act, are to:

- regulate and generally supervise the regulated sectors;
- contribute to public confidence in the regulated sectors;
- monitor and evaluate developments and trends in the regulated sectors;
- cooperate and collaborate with other regulators, where appropriate;
- promote public education and knowledge about the regulated sectors;
- promote transparency and disclosure of information by the regulated sectors;
- deter deceptive or fraudulent conduct, practices and activities by the regulated sectors; and
- carry out such other objects as may be prescribed.

FSRA's objects with respect to consumer-oriented financial services sectors (e.g., auto insurance, insurance conduct, credit union, mortgage brokering) are to:

- promote high standards of business conduct;
- protect the rights and interests of consumers; and
- foster strong, sustainable, competitive and innovative financial services sectors.

For the pension sector, FSRA's additional objects are to:

- promote good administration of pension plans; and
- protect and safeguard the pension benefits and rights of pension plan beneficiaries.

For credit unions and caisses populaires, additional objects are to:

- provide insurance against the loss of part or all of deposits with credit unions and caisses populaires;
- promote and otherwise contribute to the stability of the credit union and caisses populaires sector in Ontario, with due regard to the need to allow credit unions and caisses populaires to compete effectively, while taking reasonable risks; and
- pursue the objects set out as defined in the FSRA Act for the benefit of persons having deposits with credit unions and caisses populaires and in such manner as will minimize the exposure of the Deposit

Insurance Reserve Fund
(DIRF) to loss.

FSRA has powers and duties with respect to offering statements under the *Co-operative Corporations Act* (CCA). These include reviewing and issuing a receipt for offering statements that comply with the requirements under the CCA.

In addition, FSRA will administer and enforce the *Financial Professionals Title Protection Act, 2019* (FPTPA) when it is proclaimed.

Governance and Organization Structure

FSRA has been established as a self-funded Crown corporation with the Board appointed by the Lieutenant Governor in Council on the recommendation of the Minister of Finance (“the Minister”). The Board is accountable to the Minister and, through the Minister, to the Ontario Legislature.

The Memorandum of Understanding (MOU) establishes the accountability relationship between the Minister and FSRA (see <https://www.fsrao.ca/about-fsra/governance>).

In addition to the FSRA Act, the MOU helps to describe the Minister’s relationship to the Board and the Chair of the Board. It clarifies roles and responsibilities of the Minister, Chair, the Board, Deputy Minister and the Chief Executive Officer (CEO), in areas such as administration, communications, operations and others.

The MOU should be read together with the FSRA Act and the governing regulated-sector statutes (e.g., Insurance Act, 1990; Pensions Benefits Act, 1990; Mortgage Brokerages, Lenders and Administrators Act, 2006; Credit Unions and Caisses Populaires Act, 1994; etc.).

Board of Directors

The FSRA Act provides that the Board is to include three to eleven directors. The Minister makes appointments in

accordance with the Agencies and Appointments Directive (AAD), the MOU and the procedures of the Public Appointments Secretariat of the Government of Ontario. One director is designated as Chair by the Lieutenant Governor in Council on the recommendation of the Minister.

The Board has a dual role. It is responsible for the high-level stewardship of the organization, including oversight of FSRA management. It may also propose rules to the Minister in respect of any matter over which an Act gives FSRA rule-making authority.

Corporate Oversight

The directors oversee the management of the financial and other affairs of FSRA, which includes oversight of:

- strategic planning;
- resource allocation;
- risk management;
- financial reporting
- policies and procedures; and
- effectiveness of internal controls and management information systems.

The Board approves FSRA’s Annual Business Plan, including its annual regulatory priorities, and oversees its implementation by FSRA management. Under the FSRA Act, the Board appoints a CEO. The CEO is responsible for the management and administration of the Authority and exercises the powers and duties conferred or assigned to him/her (directly or through delegates) under the

FSRA Act, and the additional regulated sector statutes that FSRA administers as part of its mandate.

Rulemaking Authority

The FSRA Act and sector statutes provide FSRA with rule-making authority in express areas for regulating and supervising non-securities financial services and pensions in Ontario. The Board has the responsibility to approve rules that, if approved by the Minister, have the force of law.

FSRA Board of Directors ¹

Bryan Davies (Chair)
Kathryn Bouey
Blair Cowper-Smith
Joanne De Laurentiis
Joseph Iannicelli
Dexter John
Stewart Lyons
Brigid Murphy
Lawrence E. Ritchie
Brent Zorgdrager

Board Sub-Committees

Audit and Finance Committee
Deposit Insurance Reserve Fund
Advisory Committee
Governance Committee
Human Resources Committee
Pension Benefits Guarantee Fund
Advisory Committee
Rules and Policy Committee
Technology Transformation Committee

Organization Structure

FSRA's executive leadership team has extensive industry experience and regulatory expertise (Appendix A). These executives are responsible for supporting innovation in the regulated sectors, driving continuous improvements across FSRA and championing a culture that is:

- forward-looking, with the expertise to monitor, understand and address changes in markets, sectors and consumer wants and needs;
- empowered and decisive, to act quickly in a fast-paced environment;
- principles-based and flexible, to appropriately respond to the dynamic nature of the financial services and pensions sectors; and
- transparent and relationship-based, to ensure accountability and responsiveness.

¹ List of FSRA directors as at January 2021.

Environmental Scan

FSRA operates in a dynamic market. In the current pandemic environment, which has been challenging for all stakeholders, FSRA has focused on providing necessary relief and protection to consumers, regulated entities, and other stakeholders in regulated sectors – all while continuing to deliver financial safety, fairness and choice.

Key trends in regulated sectors and financial services regulation include, but are not limited to, the following:

- COVID-19's impacts on operational and strategic plans.
- Modernization and technological advancements, which continue to drive increased expectations from the consumer. These factors determine the need to update and often replace outdated internal systems and to launch inclusive products and solutions that meet consumer requirements.
- Global and domestic fintech innovation and technological advancements. These enable new and existing players and new delivery models that can offer more to the consumer.
- An ongoing imperative to drive down costs to the sectors, while freeing regulated sector participants from burdensome and often unnecessary regulatory activities.
- Diversity and inclusion in the workplace, which is increasingly acknowledged as a critical element of talent management, engaging employees and enhancing their experience. Understanding the impact of climate and cyber risks on the non-securities financial services and pension sectors.
- An enhanced approach to protecting the public interest, focused on the consumer. This has been, and continues to be, at the core of all FSRA activities.

COVID-19 Impact

The World Health Organization declared the COVID-19 outbreak as a pandemic on March 11, 2020. While recovery efforts continue, the world is still operating in a pandemic and no one has a set time frame for recovery.

FSRA is working with all sector stakeholders to manage the unknown and is continuing to drive FSRA's stated priorities. Recent experience demonstrates FSRA's ability to adapt to this volatile environment and to continue to deliver on established plans. Still, future COVID-19-related challenges may impede the progress of FSRA priorities across all regulated sectors. As a result of COVID-19, FSRA has noted and, where possible, addressed the following sector-specific trends:

Pension plan sponsors expressed operational challenges, to which FSRA and the government provided relief from certain filing deadlines. The government also provided employers with the option to defer contributions to certain defined benefit (DB) pension plans. This relief balanced employers' liquidity needs with protection of members' benefits.

Plan funding levels were affected by a drop in global equity market indices in March 2020. However, capital markets subsequently rallied, resulting in the median projected solvency ratio increasing to 98 per cent on December 31, 2020, up from 94 per cent at the end of September and 90 per cent in June.

In response, FSRA refreshed its guidance on Limitations on Commuted Value Transfers and Annuity Purchases for DB pension plans. FSRA recognizes

that administrators and other plan fiduciaries are responsible for prudently managing risks in their pension plans, ensuring the long-term financial sustainability of those plans, and making decisions by considering the interests of plan beneficiaries.

As a prudential regulator (solvency-focused), FSRA assesses pension plan risks. For single-employer pension plans (SEPPs), FSRA also assesses the sustainability of such plans in relation to the financial stability of the plan sponsor and the current operating environment. This is a prudent and necessary step towards ensuring the long-term viability of Ontario's retirement ecosystem, including the PBGF.

Economic impacts on credit unions have also been closely monitored from a prudential perspective. This monitoring included the adverse cash flow experience or changes in liquidity associated with the permitted deferral of certain loan payments for up to six months. It also included the adverse impacts on financial performance resulting from a reduction in interest rates, which is anticipated to persist over the coming years. The health of these organizations affects the products and service guarantees of the consumers who are also affected as members and depositors.

The hard market in P&C insurance continued and was exacerbated by COVID-19, with the impact being most acute in certain sectors and product lines, such as commercial liability.

With fewer drivers on roads due to COVID-19 emergency measures, FSRA issued guidance aimed at ensuring consumers are treated fairly. Insurers

reported that consumers have been eligible to receive almost \$1 billion in relief in 2020 through a variety of channels, including rebates and reductions in premiums.

FSRA continues to monitor whether the promised relief is delivered and evaluate whether insurers' rates remain just and reasonable.

COVID-19 has accelerated industry progress in digitizing the distribution of insurance products. There is also increased interest in usage-based auto insurance models due to decreased mobility.

Technological Advancement and Innovation

While challenges persist, the nature of the evolving non-securities financial services and pension sectors continues to drive positive outcomes.

Technological innovation and market pressures are:

- changing consumer expectations;
- driving the introduction of new products;
- prompting mergers among participants; and
- changing operating expenses for new non-traditional entrants.

This has introduced new business models to the sectors and improved existing ones.

Using technology to interface with clients provides new opportunities to close information gaps. FSRA will continue to monitor these technological developments to ensure that financial institutions are meeting expectations regarding business conduct and fair treatment of customers.

The mortgage and real estate sectors have been using innovative methods to help complete real estate transactions during this time. Credit unions are also actively seeking opportunities to innovate and implement new technologies. These technologies are being used to complete tasks, such as digital transfer of documentation and virtual home appraisals, which are traditionally done in person. The goals are to enhance the service experience for members, increase the level of product offerings, decrease costs and ultimately grow businesses.

Cybersecurity breaches continue to affect the financial services and pensions sectors. This has highlighted the need for financial regulators and regulated entities to have appropriate measures to maintain the privacy and security of their information and the information of persons who deal with regulated entities. These measures are particularly important as consumers and insurers demonstrate a greater acceptance for virtual healthcare.

FSRA's newly formed Innovation Office was created to support an "open-for-business" approach across FSRA, and to focus on identifying and supporting opportunities to foster innovation and business transformation. The Innovation Office will strive for a nimble and flexible regulatory landscape that protects the

public interest but does not hold back innovators, limit consumer choice or the economic benefits of industry competition and innovation.

The Innovation Office is working with stakeholders in the innovation ecosystem to analyze changes in underlying technologies, market practices and consumer preferences. The Innovation Office is also working to foster controlled innovation testing environments and to encourage "responsible innovation" that puts consumers at the forefront.

Consumer Expectation and Needs

Well-functioning financial services and pension markets promote long-term financial stability, growth, efficiency and innovation. Appropriate consumer protections build public confidence and trust.

In such markets, consumers:

- have access to the products, services and information they need to make the best decisions for themselves;
- are treated equitably;
- are not exposed to deceptive or unfair practices; and
- have their needs considered, including those of vulnerable consumers.

FSRA continues to see rapid changes in how non-securities financial services and pension plans are being offered and delivered. These changes increase the

need for regulators to quickly understand the emerging trends, consumer needs, potential vulnerabilities and pathways for resolution and to protect the public interest by using the most effective tools and powers.

While there are ongoing consumer expectations for increased choice and value for money, needs vary across the range of financial services and pension sectors. Consumers will also have different needs due to personal circumstances, their financial capability, the product or service they are obtaining, or the intermediary they are using.

FSRA is committed to using consumer research and engagement to support regulatory efficiency and effectiveness. This year, FSRA established a new Consumer Office. It undertakes research, sets the strategy for consumer engagement, and provides secretariat support to the FSRA Consumer Advisory Panel (CAP).

Together, the CAP and the Consumer Office are key to improving opportunities for consumer voices to shape FSRA's work.

Market Changes and Economic Intelligence

The increased availability of data and analysis tools has allowed for closer monitoring of the impact of economic conditions on sectors and their consumers. Such economic intelligence empowers prudential and conduct oversight. It also provides the opportunity to react to emerging

situations and prepare appropriate responses.

The complexity of insurance distribution has increased with overlapping organizations supporting multiple brands and channels, including through digital platforms. Many insurers have set up a wide range of multi-channel distribution systems to improve customer interaction and experience. To further its mandate of providing effective industry oversight, FSRA is working to achieve a more comprehensive understanding of current distribution channels.

FSRA is aware of a long-term consolidation trend in P&C insurance in Canada and routinely monitors market dynamics across the industry and in Ontario.

Within the mortgage sector, there has been an increase in the use of non-bank financial intermediaries (NBFIs) such as Mortgage Investment Corporations and private lenders, as these lenders do not need to meet Canada Mortgage and Housing Corporation and Office of the Superintendent of Financial Institutions (OSFI) mortgage underwriting guidelines.

NBFI use may continue to increase if consumers find it difficult to make mortgage payments once temporary, pandemic-related government programs end (such as the Canada Recovery Benefit and mortgage deferral programs) and if regulated financial institutions continue to tighten their underwriting criteria. There are concerns that borrowers and investors are not being informed fully about the risks and features of private mortgages.

These disclosures are necessary to ensure products are suitable for borrowers and investors and to address potential conflicts of interest.

Regulation of the sale of certain retail-oriented non-qualified syndicated mortgage investments is being transferred to the Ontario Securities Commission. This transfer may lead to changes in how mortgage-based investments are structured and sold.

Overall, the economic and environmental impacts on the non-securities financial services and pension sectors have been significant. They will continue to be a challenge for the foreseeable future. FSRA will continue to monitor the situation and seek to drive positive results for all stakeholders.

Strategic Framework/Direction

FSRA's strategic goal is to be an empowered principles-based and outcome-focused regulator. It will need to excel in four key areas to be successful:

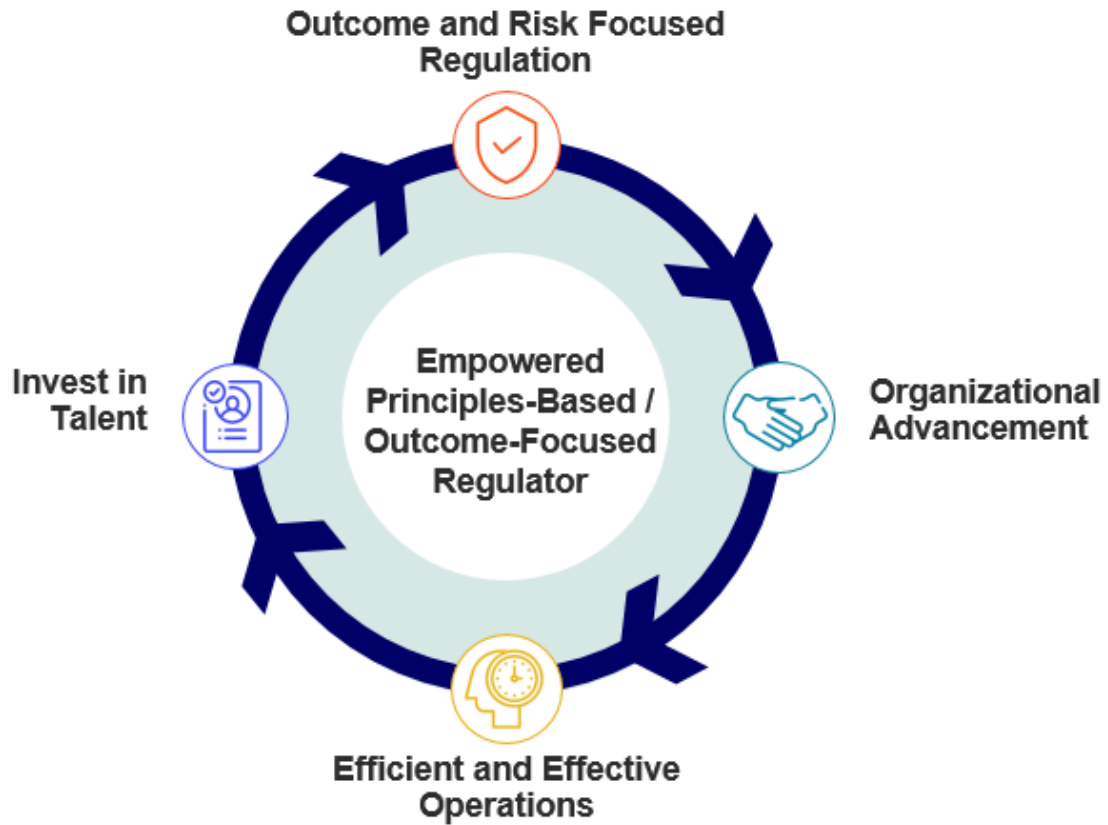
Outcome- and Risk-Focused: Principles-based, outcome- and risk-focused supervision, decisions, guidance and rule-making, to be more effective and efficient.

Organizational Advancement: Transform the organization's culture, technology and internal processes.

Invest in Talent: Recruit, develop and retain expert and skilled talent.

Efficient and Effective: Operate with consumer and stakeholder interests, and FSRA's statutory objects in mind.

Figure 1: FSRA's Strategic Framework



Overview of Sectors

FSRA is a dynamic, self-funded regulatory agency. It was established to improve consumer protections in Ontario. FSRA regulates P&C insurance, life and health insurance, credit unions and caisses populaires, loan and trust companies; mortgage brokers, health service providers (related to auto insurance), and the pension sector.

What does FSRA do?

- Promotes high standards of business conduct through regulation and supervision of its regulated sectors.
- Oversees business behaviour within the sectors it regulates (market conduct), including sector licensing and conduct regulation. This includes ensuring that the conduct of financial service providers protects the interests of consumers, as well as reviewing whether personal auto insurance rates are just and reasonable for consumers.
- Performs prudential supervision, which includes focusing on systemic risks and sustainability to protect the public interest.
 - For credit unions, that includes reviewing liquidity and capital requirements, and ensuring appropriate recovery and resolution mechanisms are in place.
 - For pensions that means promoting good administration of pension plans and protecting and safeguarding the rights and benefits of beneficiaries.
 - For Ontario-incorporated insurance companies, FSRA monitors solvency and risk in addition to ensuring that appropriate controls are in place.

Property and Casualty/Auto Insurance

The P&C/auto insurance sector provides financial products designed to protect consumers and businesses against financial loss related to many different risks, such as owning a home, vehicle or business, and associated liabilities. Ontario's P&C insurance sector represents over \$29 billion in direct written premiums, nearly 53 per cent of which are derived from auto insurance.

- FSRA's role in the sector includes: licensing P&C insurance companies, independent adjusters and agents that sell P&C insurance in Ontario to ensure they comply with the law;
- regulating the conduct of business of insurance companies, agents and adjusters to ensure the fair treatment of consumers throughout the entire product lifecycle;
- conducting prudential regulation of Ontario-incorporated insurance companies; and
- examining the affairs of the Registered Insurance Brokers of Ontario (RIBO) and Facility Association and reporting results to the Minister.

FSRA also carries out additional functions specific to Ontario's auto insurance system, including regulating auto insurance products and their underwriting, distribution and pricing and

whether auto insurance rates are just and reasonable.

Health Service Provider Sector

The health service provider sector consists of nearly 5,000 licensed health service providers that invoice auto insurance companies for statutory accident benefits claims through the Health Claims for Auto Insurance system. FSRA's role in the sector includes:

- licensing health service providers to use a centralized billing system;
- regulating the business and billing practices of licensed service providers; and
- collecting information about licensed health service providers' business systems and practices through an Annual Information Return (AIR).

Life and Health Insurance

The life and health insurance sector provides comprehensive financial products to help individuals protect key aspects of their lives against risk of loss. Products include life and health insurance, as well as related investment products. FSRA's role includes:

- licensing life insurance companies and agents that
- sell life and health insurance in Ontario to ensure they comply with the law; and

- regulating the conduct of business of insurance companies and agents to ensure the fair treatment of consumers throughout the entire product lifecycle.

Mortgage Brokering

The mortgage brokering sector enables homeownership for many Ontarians. In 2019, mortgage brokerages arranged over 345,000 mortgages in Ontario, valued at approximately \$140 billion. In Ontario, all individuals and businesses that carry on mortgage brokering and administration activities are required to be licensed with FSRA.

In FY 2020-21, FSRA regulated approximately 1,200 mortgage brokerages, 2,700 mortgage brokers, 11,600 mortgage agents and 220 mortgage administrators in Ontario. FSRA's role in the mortgage brokering sector includes:

- increasing public confidence in the sector by regulating the conduct of licensees through monitoring; and
- enforcing compliance with the Mortgage Brokerages, Lenders and Administrators Act, 2006 (MBLAA) and its regulations to protect borrowers arranging mortgages and persons investing in syndicated mortgages.

Pensions

Registered pension plans provide an important source of retirement income to a large number of employees and retirees in Ontario. The private sector is trending away from traditional single employer DB models. Still, DB membership continues to dominate both plan membership and assets in Ontario.

This is primarily due to large public-sector sponsored plans and multi-employer pension plans. A significant number of working age Ontarians do not participate in DB pension plans, but may be members of defined contribution (DC) plans. The pension sector is large with plan assets of \$688 billion in 7,075 regulated plans, with over 4.2 million plan members.

Co-operative Corporations

Co-operatives are member-owned and controlled businesses that are incorporated under Ontario's CCA. There are approximately 1,800 co-operative corporations (co-ops) in Ontario. FSRA's role in the co-op sector is to carry out powers and duties under the CCA that relate to the review of offering statements prepared by co-ops when raising capital from investors.

Credit Unions and Caisses Populaires²

Credit unions are co-operative, deposit-taking institutions that are owned by their members who are also their customers. Ontario's credit union sector has almost 1.8 million members, over 7,400 employees and assets of over \$75 billion. Ontario's credit unions are diverse in size, ranging from \$8 million to \$22 billion in total assets. FSRA's role in the credit union sector includes:

- incorporating credit unions and reviewing the related documentation;
- reviewing and approving proposed transactions involving credit unions, such as amalgamations and the purchase or sale of material assets;
- overseeing prudential activity of credit unions to ensure they comply with solvency requirements in the Credit Unions and Caisses Populaires Act, 1994; and
- regulating the conduct of credit unions (e.g., by ensuring they comply with the principles of sound business and financial practice, treat members fairly and handle complaints in an appropriate manner).

² For the purposes of this document, the term "credit union" will be used to refer to both credit unions and caisses populaires.

Financial Planners/ Financial Advisors

In the 2019 Ontario Budget, the government introduced legislation to limit the use of the titles "financial planner" and "financial advisor" to individuals who have obtained a credential from a credentialing body approved by FSRA.

Currently, there is no regulation of title use by FP/FA in Ontario. The lack of regulation creates the risk investors receive financial planning and advisory services from individuals who may be unqualified. It also creates confusion for consumers due to inconsistent title usage and risk due to an absence of minimum standards.

The FPTPA was passed in May 2019 but has not yet come into force. FSRA is working with the Ministry of Finance (MOF) to design the title protection framework for individuals who wish to use the FP/FA titles in Ontario.

The primary objective of the title protection framework is to protect financial-services consumers by creating minimum standards for title usage without creating unnecessary regulatory burden for title users. To ensure efficient and effective regulation, FSRA's proposed approach is to leverage existing licensing and professional designation bodies in the marketplace.

FSRA will establish minimum standards for FP/FA qualifications and criteria that entities must meet to obtain approval as a credentialing body and offer a FP or FA

credential. These standards will include education requirements, monitoring FP/FA title users, and effective compliance and enforcement processes. FSRA aims to implement requirements in a way that will complement regulatory regimes and frameworks that already oversee the core activities of FP/FA title users.

Statement of Priorities

FSRA continues to focus on regulatory efficiency (including burden reduction) and regulatory effectiveness through cross-sector and sector-specific priorities. FSRA's proposed priorities will continue to deliver a positive impact by improving:

- stakeholders' regulatory experience, and
- safety, fairness and choice for consumers of financial services, and members of pensions in Ontario.

The requisite implementation plan is embedded within the overview and description of each priority. These priorities signify a new or transformative approach, process and/or initiative that have not been part of normal operating procedures in the past. Once they are part of regular business practices they will no longer be a stated priority, but ingrained in how FSRA operates.

Cross-Sectoral Priorities			
Regulatory Efficiency ³ and Effectiveness			
1. Protect the Public Interest	2. Enable Innovation	3. Modernize Systems and Processes	4. Transition to Principles-Based Regulation
Sector-Specific: Targeted High-Impact Priorities			
5. Property & Casualty / Auto Insurance	6. Credit Unions	7. Life & Health Insurance	
5.1 Empower and protect P&C insurance consumers 5.2 Support government's priorities and evaluate trends in the auto insurance system 5.3 Implement auto insurance data and analytics strategy	6.1 Support modernization of credit union framework 6.2 Enhance Deposit Insurance Reserve Fund Adequacy Framework and Sector Liquidity Framework 6.3 Continue to design and develop the Integrated Risk-Based Supervisory Framework	7.1 Enhance market conduct oversight to protect consumers	
8. Mortgage Brokering	9. Pensions	10. Financial Planners & Advisors	

³ Regulatory efficiency includes FSRA's continued commitment to burden reduction in the regulated sectors. FSRA's specific burden-reduction activities are detailed throughout the Annual Business Plan.

<p>8.1 Implement recommendations from the review of the MBLAA, to the extent within FSRA's purview.</p>	<p>9.1 Support plan flexibility, evolution and principles-based applications within the existing regulatory and legislative regime</p> <p>9.2 Develop and consult on prudential supervision framework</p> <p>9.3 Refocus pension regulation to improve regulatory efficiency and effectiveness</p>	<p>10.1 Implement the title protection framework for FP/FA</p>
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Regulatory Efficiency and Effectiveness

1. Protect the Public Interest

Financial services sectors continue to undergo significant changes, which heightens the need for regulators to protect the public interest. Consumer protection leads to public confidence and trust in well-functioning financial services markets. This promotes financial stability, growth, efficiency, and innovation.

To ensure effective and proportionate financial consumer protection efforts, it is important that all stakeholders, including consumers, participate in the policy-making process.

In January 2020, FSRA established the CAP. It complements the previously established Consumer Office, which is dedicated to ensuring that consumer perspectives are understood and considered within FSRA.

FSRA has also convened a new Residents' Reference Panel on Auto Insurance. It has made recommendations to FSRA on automobile insurance regulation in Ontario. Additionally, FSRA's Consumer Office has completed preliminary work on consumer segmentation mapping to develop a baseline understanding of key consumer segments and identify potential consumer vulnerability in the regulated sectors.

In addition, the Consumer Office has assisted FSRA in gaining new insights through research on consumer perspectives, expectations and understanding of auto insurance and financial advice professionals.

As a consumer-focused regulator, FSRA will continue to use consumer insights and consultation with stakeholders to further strengthen regulatory approaches.

Effective complaints mechanisms are a significant part of robust regulatory regimes. FSRA is looking at ways to strengthen how complaints are handled in the regulated sectors. The G20/OECD Task Force on Financial Consumer Protection, a body responsible for supporting the implementation of high-level principles on financial consumer protection, highlights the importance of mechanisms that are accessible, affordable, independent, fair, accountable, timely and efficient.

In addition, information disclosure to consumers is believed to contribute not only to more effective consumer protection but also to increased transparency and trust. Where possible, research should be conducted to help determine and improve the effectiveness of consumer disclosures.

To complement regulatory efforts, consumer education and awareness will be promoted by FSRA, industry and other stakeholders. Consumers should find clear and easily accessible information, through multiple channels, on their protection, rights and responsibilities.

The new Consumer Office will also support FSRA in engaging the International Financial Consumer Protection Organisation (FinCoNet), an umbrella group for consumer financial protection authorities in 25 countries. FinCoNet's mandate is to promote sound market

conduct and strong consumer protection contributing to stability in financial services sectors around the world.

Key Deliverables:

- Develop and publish a consumer complaints framework and implementation plan for regulated sectors.
- Develop a FSRA strategy for consumer disclosures and pilot disclosure improvements.
- Develop and publish a framework for consumer education and pilot education tools/strategies.
- Strengthen cross-jurisdiction regulatory collaboration around consumer protection issues.

Outcomes:

- Greater confidence among consumers in the regulated sectors and the choices available to consumers.
- Increased understanding of people's rights and responsibilities as consumers, including the appropriate mechanisms for complaints.
- More consumers have the information and confidence required to make informed choices.
- More consumers, including those in positions of vulnerability, are appropriately protected from financial harm (e.g., the mis-selling of products) across FSRA's regulated sectors.

- More consumers, including those in positions of vulnerability, have access to high-quality financial services and products across FSRA's regulated sectors.
- A fair, timely and effective dispute resolution system will efficiently address complaints across FSRA's regulated sectors.

2. Enable Innovation

Innovation moves quickly. As a regulator, FSRA must be agile to support and adjust to the change that comes with it.

FSRA needs to be at the table to influence the innovation process. The Innovation Office has a mission to enable and support innovation across the sectors. It aims to foster responsible innovation by driving greater choice and value for consumers, while still managing risk and uncertainty to serve the public interest. The goals are better outcomes for sectors and consumers.

The Innovation Office will lead by putting the consumer first ensuring FSRA continues to deliver on its mandate to protect the public interest and safeguard public confidence and trust in non-securities financial services and pensions in Ontario.

Beginning in FY2020-21, the Innovation Office has committed to:

- Develop an inclusive innovation framework (including the vision, strategy and operating model).
- Develop a proactive innovation engagement and outreach strategy.

- Build a two-way communication channel with stakeholders, and harness the knowledge and insight gained to support forward-looking regulatory practices.
- Build an active presence with stakeholders and support the provision of proactive and forward-looking regulatory clarity.
- Review the discretionary powers needed (in addition to the rule-making authorities under the current legislative framework) to enable regulatory solutions that respond to the pace of change in the sectors FSRA regulates.

Key Deliverables:

- Execute and continue to refine the Innovation Framework.
- Strengthen communication channels between the Innovation Office, the industry, innovation centers and regulatory counterparts, and build presence with the industry and relevant organizations.
- Identify cross-jurisdictional regulatory coordination and harmonization opportunities.
- Create financial services modernization and innovation Test and Learn Environments (TLEs), particularly a TLE pilot on auto insurance following exemptive authorities, and develop a range of tools to facilitate the operation of these environments within prioritized sectors.

Outcomes:

- Minimized friction and reduced regulatory uncertainty and barriers for incremental innovation and new entrants.
- Accelerated introduction of new business models, technologies, products and benefits to consumers.
- Deeper tech expertise and understanding of consumer and social trends and new to be able to advise on effective regulation of the future.
- Active presence, collaboration, and open channels for constructive communication with the industry and other stakeholders.

3. Modernize Systems and Processes

FSRA has implemented a modern enterprise resource planning system, telephony system and productivity suite, as well as considerable improvements in online tools and website functionality. Efforts to simplify operations and make them more efficient also include digitizing paper-based documents and automating data upload and validation in several online processes.

These efforts have yielded considerable improvements in FSRA operations. However, there is an ongoing need to address core regulatory operations and the continued reliance on several outdated, inefficient, costly and, in some cases, end-of-life systems. These systems are unable to support effective and flexible regulation. FSRA will continue to modernize its Information Management/Information

Technology systems, and the processes they support, by developing and following a multi-year transformation roadmap.

The roadmap incorporates sector-specific business priorities and enterprise technology requirements. It also creates a flexible and adaptable business-operating model, supported by streamlined operational processes.

These workflow and system improvements will be key to delivering on the regulatory efficiency priority through:

- optimized and streamlined data and filing collection;
- improved service levels; and
- enhanced ability for FSRA to respond quickly to changing regulatory needs.

FSRA is committed to involving the sectors in this modernization through communication, consultation and collaboration. This will include outreach through FSRA's communication channels, forums for discovery and user experience research, and ongoing opportunities for input and feedback as the modernization takes shape.

Key Deliverables:

- Implement a technology platform to enable simplified and fully digitized operations, including a 360-degree view of regulated entities (customer relationship management solution), case management system, enterprise content management system and data analytics tools with enhanced client portals and improved consumer transparency (e.g., FP/FA public registry).

- Implement advanced online/web-based information sharing and transactional processing tools on FSRA portals.
- Develop digital document processing capabilities to support streamlined processing of all paper-based channels.
- Enable data analytics for each of the regulated sectors to empower FSRA policy and supervisory activities.
- Enhance infrastructure and establish data interfaces (new data sources and improved data exchanges), in support of: P&C insurance (auto) priority 5.3, credit unions priority 6.1, life and health insurance priority 7.1, mortgage brokering priority 8.1, pension sector priority 9.1, and FP/FA priority 10.1. Also, implement advanced analytics and reporting systems to enable more efficient decision-making across all sectors.

Outcomes:

- Improved regulatory oversight through greater access to data and analytics tools across all sectors.
- Improved relationships with stakeholders through enhanced relationship and case management capabilities, and improved tracking and operational processing capabilities (i.e., customer relationship management and case management).

- Improved and, where possible, customized user experience with the FSRA online portal.
- Improved turnaround time for licensing, filing, and registration processes.

4. Transition to Principles-Based Regulation (PBR)

FSRA is continuing its transition to a principles-based and outcomes-focused approach. This transition supports FSRA's efforts to facilitate innovation and modernize processes and systems.

PBR generally entails a reliance on a high-level, broadly-stated set of principles to communicate the objectives and outcomes to which regulatory firms should achieve rather than a prescriptive set of rules. It has been shown to be more effective than prescriptive regulation in sectors where there is complexity, change and significant diversity in the participants or their business models. Principles allow for situationally and proportionately appropriate regulatory actions and for the evolution of regulation as a regulated entity or market evolves. PBR requires the assessment of risks and market imperfections to be addressed by the regulator. It is aligned with risk-based regulation to focus regulatory activities on material issues and to dedicate resources to material risks.

To work well, such a shift requires enhanced capabilities both within the regulator and among regulated entities. FSRA has developed a new Guidance Framework and is continuing to build expertise to evaluate whether principles are being applied in a way that delivers desired outcomes.

FSRA recognizes that regulated entities need to operate differently. For example, directors and management need to embed principles and have governance, controls, policies, oversight and processes to support/monitor principles. FSRA has already implemented new processes for engaging with regulated sectors for their input on FSRA, the sector principles, and the desired outcomes. Understanding their views on FSRA's regulatory approaches is central to successful PBR.

Key Deliverables:

- Update external supervisory/regulatory processes by developing and issuing guidance on a principles-based approach and, subsequently, providing principles-based interpretation, information and decision guidance.
- Complete a review of the FSRA Guidance Framework and update as required to ensure alignment with PBR.
- Initiate each sector's participation in implementing a PBR approach in developed guidance supporting the following key priorities:
 - P&C insurance – empower and protect P&C insurance consumers.
 - Credit unions – update supervisory and risk-assessment approaches, sound business practices and capital and liquidity rules.
 - Life and health insurance – enhance market conduct oversight to protect consumers.

- Pensions – support plan flexibility, evolution and principles-based applications within the existing regulatory and legislative regime.
- FP/FA – implement the title protection framework.
- Develop a PBR rollout, to ensure understanding of the approach and clarify examples of PBR deliverables in each sector.

Outcomes:

- A cooperative, principles-based approach embedded within the regulated sectors. As a result, less prescriptive oversight resources are required (for entities and the regulator) while improved outcomes are generated for consumers.
- Increased internal and external understanding of PBR and supportive behaviours.

5. Property and Casualty/Auto Insurance

5.1 Empower and protect P&C insurance consumers

FSRA's vision is to promote financial safety, fairness and choice in non-securities financial services, including P&C insurance. FSRA will build on the core priority of enhancing regulatory effectiveness by taking action to empower and protect consumers, including claimants, with a focus on auto insurance rate regulation. FSRA aims to enhance consumer choice, promote innovation, and foster a more competitive and stable auto

insurance marketplace.

Key Deliverables:

- Find new consumer-focused efficiencies and improvements to continue transforming auto insurance regulation. This includes expanding on the success of the Standard Filing Guidance, improving approval timelines on non-standard forms, and implementing rate regulation reforms based on input from FSRA's Technical Advisory Committee (TAC) for Transforming Rate Regulation.
- Protect consumers by ensuring auto insurance rates are reasonable, through improved use of benchmarks and developing additional tools for identifying unreasonable rates.
- Establish expectations for enhanced accountability for insurers in rating and underwriting compliance.
- Identify and implement opportunities to improve consumer awareness, by enhancing the transparency, quality and comprehensibility of disclosures to consumers by FSRA and the sector.
- Finalize a proposed rule defining Unfair or Deceptive Acts or Practices under the Insurance Act; seek approval from the Minister to bring the proposed rule into force; and implement a supporting supervisory regime.
- Enhance market conduct oversight through improved coordination with RIBO, data analytics and insurer

examinations, with an emphasis on the fair treatment of customers. This includes monitoring activities that pose significant harm to consumers (such as the circumvention of “take all comers” auto insurance requirements) and exploring opportunities to review existing conduct standards.

- Seek consistent application of Fair Treatment of Customers (FTC) guidance across Canada, in consultation with stakeholders and regulators.

Outcomes:

- Improved effectiveness of Ontario’s rate regulation framework.
- Improved transparency, disclosures and public awareness regarding P&C insurance and auto insurance rates, in particular.
- Improved regulatory effectiveness and removal of barriers to competition and innovation.
- Improved oversight of auto insurance rating and underwriting accuracy.
- Improved monitoring of consumer harms.

5.2 Support government’s priorities and evaluate trends in the auto insurance system

FSRA is taking action to support the government’s priorities in the auto insurance sector, including deterring fraud and abuse, improving regulatory

effectiveness, enabling electronic communication, removing barriers to innovation and enhancing consumer choice.

While supporting these priorities, FSRA will continue to build on its capacity for evaluating trends in the auto insurance system and identify and recommend where it can take action to protect the public interest and improve regulatory efficiency and effectiveness.

Key Deliverables:

- Implement appropriate changes within FSRA’s purview to support government priorities.
- Build and operationalize a fraud and abuse strategy, including Health Service Provider (HSP) supervision, to deliver reduced costs, improve consumer protection, enhance regulatory efficiency and reduce the regulatory burden.
- Build and operationalize a Test and Learn Environment pilot for auto insurance modernization following the government-granted exemptive authorities.

Outcomes:

- Principles-based approach to support expected government auto insurance priorities while acting within FSRA’s purview.
- Improved consumer outcomes.
- Improved deterrence of fraud and abuse.
- Improved regulatory efficiency and effectiveness, including oversight, forms and processes.

5.3 Implement auto insurance data and analytics strategy

Understanding the regulatory environment, how the industry behaves, and the outcomes for consumers and markets is key to FSRA's role. The amount of data generated by the insurance industry and collected by the regulator continues to grow and change. As it does, it is critical to leverage the collected data to support rate and underwriting regulation transformation, and auto insurance reform.

FSRA will continue to develop and implement its auto insurance data and analytics strategy. The focus is on developing FSRA's data infrastructure and analytical capabilities to enhance the regulation of Ontario's auto insurance sector.

Key Deliverables:

- Develop a detailed implementation plan for FSRA's auto insurance data collection strategy on prioritized external data sources.
- Use collected data to monitor auto insurance market health, understand consumer needs, and seek opportunities to support the development of FSRA's fraud and abuse strategy (in support of priorities 5.1 and 5.2).
- Consult with industry on new data and reporting requirements for insurers and develop supervisory analytical tools. The goal is to verify insurer underwriting and rating compliance, assess consumer impacts and model fairness, and

identify unjust or unreasonable rates (in support of priority 5.1).

Outcomes:

- Improved ability to access, share and process data in a timely way by leveraging technology. Improved supervisory efficiency and support for auto insurance reforms and fraud reduction.
- Enhanced analytical support for supervisory approach for underwriting and rating compliance.

6. Credit Unions

6.1 Support modernization of credit union framework

In FY2020-21, FSRA held a series of meetings with credit union and caisse populaire sector representatives. The parties worked collaboratively to establish an agreed upon work plan, which prioritizes the review and development of guidance, rules and supervisory changes to implement efficient and effective regulation.

FSRA has begun to implement the plan, promoting the modernization of the credit union framework. Moving forward, FSRA will continue to follow this work plan, and develop new rules to support the new credit union legislation that the government recently passed as part of the 2020 Ontario Budget.

Key Deliverables:

- Support MOF in developing regulations under the new credit union legislation.
- Develop, consult on and issue high-priority guidance documents and, where legislative authority is provided, principles-based rules identified in FSRA's work plan. That includes rules to:
 - support the new legislative framework proposed by the government (e.g., Capital and Liquidity)
 - set standards on sound business and outline financial practices to replace those currently set out in DICO By-Law #5
 - develop guidance on Data Governance and IT Risk Management, with a view to finalizing it in FY2022-23.

Outcomes:

- A modernized framework, reinforced by FSRA's work plan with the sector, will ensure better protection of credit union member deposits.
- It will also promote member confidence, through stronger, better governed and more resilient credit unions. This will result in more transparent, efficient and effective regulation.

6.2 Enhance Deposit Insurance Reserve Fund Adequacy Framework and Sector Liquidity Framework

Preserving strong governance of the DIRF is important for promoting safety, soundness and consumer confidence in Ontario's credit union system.

In the past year, FSRA commissioned the development of a stress-testing framework to assess the adequacy of the DIRF. FSRA has also worked to ensure better structural liquidity tools and reporting.

Moving forward, FSRA will work with the credit union sector to refine the DIRF assessment to ensure it can meet potential deposit insurance obligations.

Key Deliverables:

- Engage the credit union sector to determine risk data needs for the DIRF framework and advance the work for DIRF framework enhancement.
- Consult on and finalize a framework for assessing DIRF adequacy, reassess the DIRF premium assessment regime and report to the Minister on DIRF adequacy.
- Continue work with key partners on sectoral structural liquidity issues to examine access to sufficient emergency liquidity for Ontario credit unions.

Outcomes:

- Improved depositor protection and sector stability.
- Greater public, regulated sector and regulatory confidence in the liquidity and capital resources of the sector.
- Confidence that statutory deposit insurance obligations will be honoured, and that the

sector will be resilient under a variety of defined scenarios.

6.3 Continue to design and develop the Integrated Risk-Based Supervisory Framework

Major changes and developments in the financial services industry have changed the nature of risks and risk management of financial institutions. In FY2020-21, FSRA identified principles and worked on the design of an Integrated Risk-Based Supervisory Framework.

The enhancements ensure that FSRA's risk-based supervision is principles-based, outcomes-focused, dynamic and forward-looking. It will help ensure that FSRA can respond proactively and effectively to changes in the Ontario credit union system. It will also promote sector stability and institutional resiliency through a sound resolution regime and recovery planning standards for credit unions.

The Risk-Based Supervisory Framework sets out the principles, standards, concepts and processes that FSRA uses to guide its supervision of credit unions. It explains why and how supervisory work is carried out. The primary focus of FSRA's supervisory work is to determine the impact of current and potential events, in both the internal and external environment, on the risk profile of each credit union.

Key Deliverables:

- Prepare the draft Framework documents and complete stakeholder consultation on approach guidance.
- Identify data requirements from external sources, based on the

supervisory framework and its objectives.

- Identify IT system requirements to support the framework.
- Finalize and further implement the new market conduct supervisory approach for credit unions.
- Work with credit unions to implement the recovery planning guidance developed in FY2020-21 (e.g., develop recovery plans where required).
- Work with MOF and the credit union sector on developing and documenting FSRA's approach to resolution.

Outcomes:

- A principles-based, risk-based and outcomes-focused supervisory framework for Ontario credit unions, which efficiently and effectively promotes institutional resilience and sector stability.

7. Life and Health Insurance

7.1 Enhance market conduct oversight to protect consumers

Establishing enhanced market conduct oversight is critical to ensuring consumer protection and maintaining public confidence in the life and health insurance industry.

In this sector, insurers have increasingly been outsourcing a variety of functions across a distribution network, which includes intermediaries such as Managing

General Agents (MGAs). Large proportions of life and health insurance sales are generated by the distribution network. Given this trend, and to ensure market conduct requirements are met, FSRA is assessing distribution channels that rely on MGAs. This assessment will help FSRA to understand the sales process and how insurers, agents and MGAs interact with the public.

FSRA has established an industry TAC to support this work. In addition, FSRA completed a study of data derived from Life Agent Reporting Forms submitted to FSRA by insurers to report on possible misconduct and lack of suitability among life insurance agents. The study's conclusions will contribute to the key deliverables.

In recent years, a number of initiatives have improved and strengthened regulatory standards for distributing investment products, particularly regarding the level of information disclosed to consumers. FSRA is reviewing the distribution of segregated funds and considering the extent to which similar enhancements are needed.

Key Deliverables

- Support FTC principles by leading the implementation of a Canadian Insurance Services Regulatory Organizations (CISRO)-harmonized industry Code of Conduct for intermediaries, for implementation in 2022.
- Support FTC principles by developing and consulting on options for a proposed regulatory framework and supervisory approach for

distribution channels (e.g., MGAs).

- Prioritize building a new dedicated agent conduct team and a supervisory framework. When doing so, FSRA would consider solutions for improving advisor oversight proposed by the industry. Launch implementation of the supervisory framework for agent conduct.
- Review the distribution and administration of segregated funds in Ontario, including concerns related to consumer harm and the disclosure available for similar investment products. Review the developments in FTC principles, and determine whether new standards are needed to enhance investor protection for segregated funds.
- Support FTC principles by reviewing commercial practices of Tier-1 Insurers to evaluate implementation of FTC principles across distribution channels.

Outcomes:

- A CISRO-harmonized industry Code of Conduct for intermediaries, to enhance consumer protection.
- Industry is clear regarding FSRA's expectations of the life and health insurer- -MGA relationship, improving public interest outcomes.
- Additional insights are gathered on life agent conduct through establishing the supervisory plan

and team, to inform FSRA of approaches for improving consumer protection.

- Industry is clear regarding FSRA's expectations around information for consumers on the total cost of their segregated funds, to help them make more informed decisions.

8. Mortgage Brokering

8.1 Implement recommendations from the review of the MBLAA, to the extent within FSRA's purview

FSRA will work with MOF on implementing the recommendations from the [report of the five-year review of the MBLAA](#) to the extent within FSRA's purview. The report's recommendations focus on:

- modernizing and streamlining the MBLAA to increase access to the mortgage market for homeowners, lenders and investors, by improving regulatory efficiency and reducing burden; and
- improving consumer and investor protection.

Key Deliverables:

- FSRA will support the government in implementing the recommendations within FSRA's purview and jurisdiction, including:
 - Reducing red tape for commercial mortgage transactions between sophisticated entities;

- Reducing regulatory burden by establishing new classes of licensing;
- Raising and streamlining educational and professional standards for agents and brokers; and
- Implementing registration for certain private lenders.

Outcomes:

- Ongoing support for government priorities and policy direction, with a focus on burden reduction.
- Consumer protection is enhanced while reducing burden for the mortgage brokering industry.

9. Pensions

9.1 Support plan flexibility, evolution and principles-based applications within the existing regulatory and legislative regime

FSRA will work to ensure appropriate principles-based and outcomes-focused implementation of the regulatory framework while supporting vibrancy and flexibility in Ontario's pension sector. This will happen by increasing regulatory efficiency and effectiveness, reducing costs, and facilitating sector evolution and innovation (e.g., around plan transactions, transfers and consolidation).

FSRA will work with the sector on issues around pension plan member communication and engagement strategies. The goals are to improve outcomes in retirement, support FSRA's statutory objects, promote good

administration of pension plans, and protect the pension benefits and rights of plan members. All of this builds on:

- initiatives around reconnecting members to their pension plan;
- work on DC pension plan supervision (Priority 9.3);
- work on DB multi-employer pension plan (MEPP) targeted review (Priority 9.2); and
- research from FSRA's Consumer and Innovation Offices.

Key Deliverables:

- Begin consultation with a special purpose TAC to identify ways, within the regulatory framework, to foster a vibrant employment-based pension pillar in Ontario. FSRA will examine regulatory barriers to promote good pension plan administration.
- Towards the end of FY2021-22, FSRA will engage the pension sector, through another special purpose TAC, to develop thought leadership on member communication and engagement strategies. This engagement will draw on existing research and practice and be completed in FY 2022-23.

Outcomes:

- Administration of pension plans that is facilitative for employers; cost efficient; can leverage innovative practices; and will ensure that Ontario plan members are well-informed regarding their retirement benefits, and how those pension benefits are protected.

- Through the special-purpose TAC, FSRA will help ensure that members understand their pension rights through simple language and find opportunities to simplify the current legislative and regulatory framework via existing rule-making powers.

9.2 Develop and consult on prudential supervision framework

FSRA will enhance its oversight of prudential pension matters to ensure appropriate assessment of risks and targeting of supervision. FSRA will continue to engage the sector through its existing standing TAC and Retiree Advisory Panel.

Key Deliverables:

- Continue to deliver a supervisory approach for DB SEPP that are actively monitored by FSRA. FSRA uses a number of predictive and preventative tools and supervisory methods to improve outcomes for pension plan beneficiaries where there may be a concern around the security of the benefits promised.
- Continue to work on the long-term viability and financial sustainability of the PBGF. To that end, FSRA will enhance its predictive analysis with stochastic (probability based) modeling and add expertise to its risk analytics team.
- Continue to work collaboratively with large public-sector pension plans to:

- monitor and enhance FSRA's supervision of investment risks;
- increase the understanding of governance and systemic risks in terms of plan assets and membership in Ontario's largest pension plans; and
- pilot common liquidity risk metrics among the large public sector pension plans.
- Discussions will also focus on best practice recommendations around identifying and monitoring investment risk. This includes appropriate disclosures for leverage and illiquid assets.
- Develop a leverage risk-governance framework through chairing the Canadian Association of Pension Supervisory Authorities (CAPSA) leverage committee.
- Implement learnings and share findings with MOF from a targeted review of DB MEPPs.
- Pilot benchmarks against highest-impact best practices for governance, risk management and communication, and consider appropriate supervisory tools (e.g., scorecards, etc.).
- Continue to support MOF with its implementation of a target benefit framework. To support the legislative framework, FSRA will develop and consult on an appropriate principles-based and outcomes focused supervisory approach for DB MEPPs.

Outcomes:

- FSRA will continue to evolve its predictive analysis capabilities with respect to PBGF-eligible pension plans that are registered in Ontario and engage with single-employer DB pension plans that are actively monitored by FSRA. These tools and supervisory methods improve outcomes for pension plan members, allow FSRA to better understand and manage potential risks to the PBGF and improve the focus on regulatory efficiency and effectiveness.
- The use of common liquidity metrics will improve the understanding and supervision of liquidity risk, and of governance and systemic risks in Ontario's largest pension plans.
- The use of scorecard and benchmarking with DB MEPPs will result in more unified governance, risk management, operational and communication practices across MEPPs, enhanced risk profiles, and improved focus on regulatory efficiency and effectiveness.

9.3 Refocus pension regulation to improve regulatory efficiency and effectiveness

- FSRA will continue to focus resources on high-value regulatory activities and on improving regulatory efficiency and effectiveness. A major step towards these goals is completing the update of its Guidance Framework,

describing approaches, improving processes, and modernizing information management and information technology.

- In doing so, FSRA will continue to assess the efficiency and effectiveness of its regulatory framework and other practices for all plan types. The goal is to ensure FSRA's practices are principles-based, outcomes-focused and proportionate to regulatory objectives. Across its work, FSRA will collaborate with MOF on regulatory improvements identified through MOF's consultations, as well as those of FSRA.
- FSRA will also collect and report on certain process and system changes that could support regulatory efficiency for pension plans (e.g., DC wind-ups, Form 7 updates).

Key Deliverables:

- Continue the work of a special purpose TAC for DC pension plans, through a joint collaboration with OSFI. This work supports the development of principles-based and outcomes-focused supervisory approaches for DC plans (e.g., member behaviour and engagement, investments, fees, governance, etc.). Once the TAC concludes its work, FSRA will initiate a public consultation on new guidance and implement such guidance, approaches and other key changes.
- Conclude the work of the special purpose TAC on pension

division resulting from marriage breakdown, and issue final guidance following public consultation. With the TAC, FSRA will explore the impact of drafting a new rule through the existing rulemaking powers under the Pension Benefits Act, 1990 regarding family law matters. If a new rule is proposed, FSRA will consult in FY2021-22.

Outcomes:

- The TAC work on DC pension plans will result in:
 - enhanced understanding of issues and risks for DC plan members and administrators;
 - a more appropriate supervisory approach for DC pension plans; and
 - improved regulatory efficiency and effectiveness.
- FSRA will track other metrics and trends associated with asset transfer applications.
- FSRA will shift its guidance on pension division resulting from marriage breakdown to a more principles-based, comprehensive document and produce a plain-language guide for plan members. This will result in a simpler, more transparent and more equitable regime for pension division on marriage breakdown. This will enable consumers to make well-informed decisions and promote good plan administration practices.

10. Financial Planners/ Financial Advisors

10.1 Implement the title protection framework for Financial Planners/ Financial Advisors

Individuals using the “financial planner” and “financial advisor” titles should be appropriately qualified through meeting minimum standards so consumers can have confidence when relying on these financial professionals. This is the goal of the Financial Planner/Financial Advisor (FP/FA) title protection framework. It will promote confidence and professionalism in the sector and avoid confusion for investors/consumers who currently may see the FP/FA titles used without assurance of qualifications.

Under the framework, FSRA will establish:

- minimum standards for FP/FA title use (i.e., approved FP/FA credentials); and
- approval criteria that entities must meet to obtain approval as a credentialing body under the FPTPA.

Organizations seeking approval as credentialing bodies will need to meet standards, including education requirements, monitoring FP/FA title users for conduct, and effective compliance and enforcement.

By leveraging existing licensing and designation bodies, FSRA will also implement efficient processes and procedures to approve credentialing bodies and FP/FA credentials and develop an effective supervisory approach for the

oversight of the framework.

FSRA will have the authority to conduct examinations of and issue compliance orders against credentialing bodies for breaches of the FPTPA, and take action against non-credentialed FP/FA title users.

Key Deliverables:

- Complete consultation process for all rules and guidance governing the title protection framework.
- Finalize operational processes and procedures to approve credentialing bodies and FP/FA credentials.
- Develop and implement a supervisory approach for the title protection framework with respect to credentialing bodies and action against non-credentialed FP/FA title users.
- Upon proclamation of the FPTPA and approval of the FPTP Rule, accept applications from entities seeking approval as credentialing bodies under the FPTPA and determine which should be approved.
- Operationalize and fully implement the title protection framework, including a public education campaign.
- Work with MOF and other stakeholders to identify and implement any required changes to legislation and/or regulations to support the implementation of the FP/FA framework.

Outcomes:

- Increased consumer knowledge and awareness of the FP/FA titles.
- Increased consumer confidence that FP/FA title users are qualified to provide financial planning and advisory services.

Performance Measures and Targets

FSRA's priorities will continue to deliver positive outcomes by improving:

- regulatory efficiency and effectiveness;
- stakeholders' regulatory experience; and
- safety, fairness and choice for consumers in Ontario.

A core foundation of FSRA's activities is aligning them with principles-based and outcomes-focused regulation.

In addition to the measurable outputs associated with the activities and priorities outlined in this plan, each priority has clearly stated desired outcomes. This is an important step in developing quantifiable outcome measures for all FSRA endeavors.

From a more operational perspective, FSRA's goal is to create clear service expectations. In FY2020-21, FSRA developed new performance measures and targets that meet FSRA's service standard principles and drive our desired outcomes. FSRA's service standards will increase transparency and accountability for the delivery of regulatory activities.

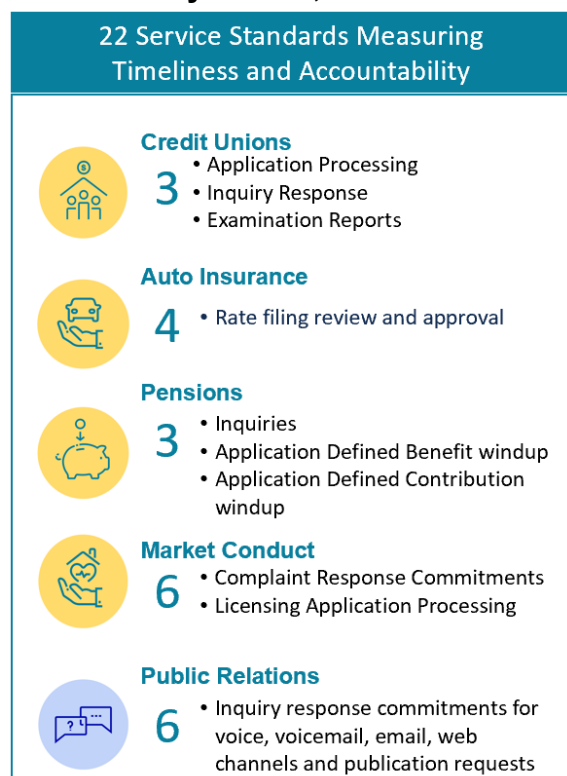
FSRA is committed to working with stakeholders to develop and implement service standards that support responsive processing of regulatory matters and to do so in a timeframe that facilitates the cost-effective provision of

non-securities financial services and pensions. The principles that will guide future standards include accountability, effectiveness, efficiency, adaptability, collaboration and transparency.

To deliver on this priority, FSRA conducted a review to identify high-priority services that need standards. Internal teams then assessed each service to determine the factors that affect delivery to appropriately set meaningful targets for each standard. The targets set a measurable level of performance when delivering a service under normal conditions (i.e., expected level of demand for regular day-to-day operations).

Alongside a public consultation, in October 2020 FSRA launched 22 service standards (Appendix B) measuring timeliness and accountability. FSRA collected feedback and, where practicable, revised the standards and/or targets. Service standard performance against targets will be reported quarterly, beginning in early 2021 (Figure 2).

Figure 2: Number of FSRA Service Standards by Sector, 2021



These performance measures and targets will be published, tested, revised and improved periodically. This review will apply to the annual business plan process and the associated priorities, as well as the operational service standards. During service standard reviews, the standards will be fully assessed. This may result in augmentations and/or deletions to support delivery of meaningful and cost-effective information.

Risk Identification, Assessments and Mitigation Strategies

FSRA has adopted a three-lines-of-defence model to its operation. The first line of defence is performed by the risk owners, covering risk identification, assessment and mitigation.

The second line of defence is the responsibility of the risk function, performing oversight, monitoring and reporting of FSRA's risk profiles.

The third line of defence, internal audit, is outsourced to a major accounting firm. The Internal Auditor reports to the Audit and Finance Committee (AFC) of the Board on financial matters and to other Board committees on matters related to their oversight areas. The AFC oversees the internal auditor on behalf of the Board.

FSRA is guided by a comprehensive Enterprise Risk Management (ERM) Framework. To effectively fulfill its statutory objectives and mandated responsibilities, FSRA will continue to upgrade its Framework along with relevant risk tools to align with the needs of its operational requirements and to adapt to the changing risk environment.

Risk management at FSRA is supervised at both the executive level and the Board level. At the operational level, FSRA's risk management oversight function rests with the Chief

Risk Officer and his team. The Risk Management Committee (RMC), which includes FSRA's executive team, supports the risk management team as a forum for communication and oversight of FSRA's corporate-wide risk profile and risk-mitigation strategies. At the Board level, the Governance Committee of the Board oversees risk at the broader enterprise level under a delegated authority while the Board has ultimate oversight for risk.

The effective operationalization of the ERM Framework is fulfilled by the Risk Appetite Statement, which is in the process of being finalized. It will serve to guide FSRA in ensuring it is taking acceptable levels of risks in delivering its mandate and pursuing its strategic goals and objectives.

FSRA's risk culture will continue to drive the operationalization of the ERM Framework. Risk owners will continue to be responsible for risk identification, assessment and mitigation functions, while the risk management team takes an active role in performing its second line of defense function. On a periodic basis, FSRA has been actively tracking its risk exposures and closely monitoring risk-mitigation strategies through a quarterly risk-monitoring process. Risk profiles are tracked and presented by functional areas at RMC meetings for executive review and to the Governance

Committee of the Board.




The Compliance Enterprise Framework has been developed to establish a process for adherence to applicable legislation, regulation and directives. The framework highlights the roles and responsibilities of internal stakeholders and the standard of operations required to carry out daily activities, through well-drafted approved policies, awareness and training, compliance attestations, regulatory watch, and continuous monitoring of functional areas.



FSRA continues to improve its Privacy Management Program to meet its legislative obligations under the *Freedom of Information and Protection of Privacy Act* (FIPPA). This includes evaluating projects that involve the collection, use and/or disclosure of personal information to ensure compliance with the FIPPA, identifying privacy risk and mitigation strategies, and providing privacy training to staff across the organization with the goal of ensuring awareness of FSRA's privacy obligations under the FIPPA. FSRA will continue to reinforce the importance of privacy across all functional areas.




Overall, at the enterprise level, FSRA is currently exposed to the major risks identified in Table 1. In response, FSRA has put in place adequate mitigation plans to ensure that these risks are properly addressed. The risk management team performs effective challenge to monitor the accuracy of FSRA risk assessments and the effectiveness of mitigation plans, on an ongoing basis.

Table 1: FSRA Major Risks

Legend:  Improving  Stable  Deteriorating

	Risk Title	Trend	Mitigation
1. Sustainability of funds			
	<p>Insufficient DIRF</p> <ul style="list-style-type: none"> • DIRF Risk arising from an insufficient DIRF to pay insured depositors of insolvent credit unions 		<p>FSRA closely monitors liquidity and capital ratios at all credit unions, through information returns, and intervenes when necessary.</p> <p>FSRA is enhancing the DIRF adequacy assessment methodology.</p>
	<p>Limited access by credit unions to emergency liquidity funding</p> <ul style="list-style-type: none"> • Risk of not having an established emergency liquidity access for credit unions in times of crisis due to legislative impediments. 		<p>In December 2020, FSRA entered into a new \$2 billion line-of-credit agreement with the Ontario Financing Authority (OFA), which better enables FSRA to provide emergency liquidity to otherwise viable credit unions experiencing short-term liquidity stress, thus maintaining stability and confidence.</p> <p>FSRA has established relevant Memorandum of Understandings with the BC Financial Services Authority for the exchange of data, including Central 1 liquidity information, and with the Bank of Canada (BOC), which could enable future access for Ontario credit unions to the BOC's liquidity funding facilities. Moreover, as of December 31, 2020, Central 1 has legally segregated its Mandatory Liquidity Pool into a structure that is better protected from creditors of Central 1.</p>
	<p>Insufficient PBGF</p> <ul style="list-style-type: none"> • Risk of an insufficient PBGF, to cover claims arising from a SEPP solvency funding deficit and insolvency 		<p>FSRA focuses on prudential supervision of SEPPs for early risk identification, monitoring and intervention, to minimize the potential claims to the PBGF.</p> <p>FSRA is working on a return-seeking investment strategy to support the prudent management of assets in the PBGF and better tools (e.g., stochastic modelling) to better assess potential</p>

	of Plan Sponsor(s), at the same time.		PBGF draws and enable FSRA to more effectively manage the fund.
2. Organizational maturity challenges			
	<p>Legacy: Unsupported software & technology stack and legacy domains</p> <ul style="list-style-type: none"> • Risk that key business applications are running an unsupported technology stack, security patches are unavailable, and applications run into issues that cannot be resolved in a timely manner. 		<p>FSRA has developed a digital transformation blueprint, which aligns processes, data, technology, and stakeholder interactions with FSRA's business vision and priorities. The digital transformation program is expected to replace the legacy applications by 2025.</p> <p>Currently, FSRA ensures that a back-up of systems is performed regularly. A Disaster Recovery Playbook was written and tested in 2019 and a domain consolidation project was completed.</p> <p>In addition, FSRA is in the process of performing 2020 Runbook review and updates, tactical application enhancements, and decommissioning of systems, as part of the upgrade or digital transformation program.</p>
	<p>Cybersecurity</p> <ul style="list-style-type: none"> • Risk that FSRA systems are breached or compromised, which may lead to the theft of information and/or impairment of FSRA's ability to sustain IT operations. 		<p>FSRA has taken action to mitigate the most serious exposures and is implementing a cybersecurity program, tools and controls to set up a modern and adequate cybersecurity practice. The overall cybersecurity program is driven by the National Institute of Standards and Technology Cybersecurity Framework, which leverages a risk-based approach to address the cyber threats faced by the organization. At this stage, FSRA's priority includes policy, governance, process, risk management and resourcing, to support operational capabilities that will be acquired and developed. Certain tactical, operational and technological capabilities, such as training and awareness and testing defences, are being prioritized in the short-term to address cyber risks of higher concern.</p> <p>Moreover, to improve protection, FSRA built and implemented a new primary data centre presence located in Guelph. A Chief Information</p>

			Security Officer was also appointed to drive cybersecurity initiatives to enhance the organization's overall cybersecurity posture.
<p>Regulatory & Cultural Transformation</p> <ul style="list-style-type: none">• Risk that FSRA needs to transform the regulatory frameworks and organizational culture it inherited, through an aggressive set of transformative priorities, while continuing to provide effective and efficient day-to-day regulation with limited resources.		<p>FSRA continues to monitor service delivery and ensure it is consistent with published commitments, such as burden reduction and regulatory effectiveness.</p> <p>FSRA has implemented transformative work to change the organization's culture, to re-think its regulatory foundations, and to focus on both core regulatory activities and priorities, through a structure and personnel that combine attention to core regulation and substantive specialist expertise, and an organization that is highly collaborative and transparent with its stakeholders.</p>	
3. Emerging risks associated with COVID-19			
<p>Macroeconomic & Systemic</p> <ul style="list-style-type: none">• Risk that the economic downturn brought about by the pandemic may threaten the financial soundness and stability of FSRA's regulated financial sectors.		<p>FSRA places strong focus in promoting effective governance and risk management in the regulated sectors.</p> <p>FSRA is closely monitoring the financial soundness of the regulated sectors, using available tools, and issues regulatory relief or guidance to regulated sectors, as appropriate. Moreover, it is in constant coordination with other regulators and relevant government agencies as part of its strategy to monitor the systemic impact of the pandemic to the financial industry. This involves ensuring within FSRA's legislative capacity that appropriate liquidity facilities applicable to its regulated sectors are in place and readily accessible during a systemic crisis.</p>	
<p>Operational Resilience</p> <ul style="list-style-type: none">• Risk of a service disruption due to events such as a		<p>FSRA has completed the Business Continuity Management Policy and Cyber Security Policy to manage risks, which may affect operational resilience. FSRA has developed Pandemic Crisis, Cyber Security, Systemic Crisis and</p>	

	pandemic, cybersecurity, physical disaster and systemic risk events.		Physical Disaster Playbooks to provide guidelines in disruptive situations including COVID-19 crisis.
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* Reflects general deterioration due to the pandemic

Financial Information

The FY2021-22 FSRA budget was developed to support FSRA's mandate to be an empowered, principles-based regulator. It enables FSRA to fulfill its regulatory requirements and address its key priorities in its third year of operations.

The schedule below presents FSRA's Board-approved budget for April 1, 2021 to March 31, 2022, a comparison to the prior year, and plans for the next two fiscal periods.

(\$000's)	FSRA F20-21	FSRA F21-22	FSRA F22-23	FSRA F23-24
	Budget	Budget	Plan	Plan
Activity Fees	10,337	8,954	9,500	10,200
Fee Assessment	74,097	74,814	77,000	82,200
Licensing Fees	13,457	12,332	13,500	13,800
Other*	1,502	3,961	4,000	3,700
Total Revenue	99,393	100,061	104,000	109,900
<i>YoY change</i>		0.7%	3.9%	5.7%
Direct Costs	55,937	58,500	59,361	61,472
Common Costs	43,456	45,443	47,139	48,428
Total Costs	99,393	103,943	106,500	109,900
<i>YoY change</i>		4.6%	2.5%	3.2%
Recovery Over /(Under)	-	(3,882)	(2,500)	-
Funding from F19-20 Excess				
Revenue Over Cost		3,882	2,500	
Net Balance	-	-	-	-

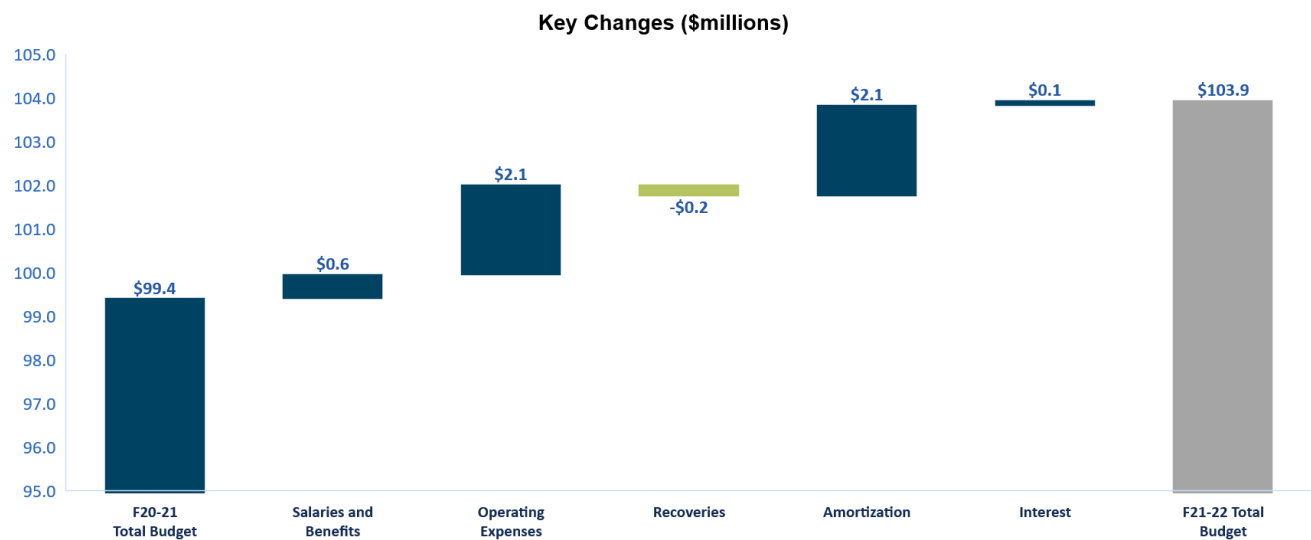
*HSP under recovery and FPFA revenue

Please refer to page 53 for the details of FY2022-24 plans.

The FY2020-21 budget is the Board-approved 12-month budget and is presented for comparison purposes. As of October 2020, FSRA is forecasting a favorable \$7-10 million variance to the FY2020-21 plan, largely due to a number of human capital vacancies. Once the variance is confirmed through external audit, FSRA will conduct a determination of whether to reduce borrowing requirements, repay loans, or reduce future sector assessments to minimize increases. The outcome of this analysis and the Board's decision will be disclosed to stakeholders.

FY2021-22 Board-Approved Budget

FSRA proposes a \$103.9 million cost budget for FY2021-22 to achieve its mandate and stated priorities. The chart below presents the net increase of budgeted costs compared to the FY2020-21 cost and revenue budget.



To deliver on its priorities FSRA will invest an additional \$1.7 million in human capital resources in FY2021-22. This investment will improve FSRA's capabilities in sectoral and functional expertise. Executive leadership have identified specific regulation/supervisory areas that require resourcing. FSRA will increase investments in supervisory oversight life agents and auto enforcement. Further investments will be made in credit union resolution and recovery capabilities due to the increased risk presented by the COVID-19 pandemic and ensuing economic stress. Investments to replace the inadequate core IT systems will continue. These investments are offset by cost efficiencies of \$0.8 million through managing staffing deployments in direct sector activities and back-office support functions and \$0.3 million in human capital savings in the regulation of individual pension plans. Overall payroll costs will increase by \$0.6 million.

The \$2.1 million increase in operating expenses includes investments to support FSRA's commitment to improve regulation, investments to address auto insurance data analytics initiatives, and investments in a credit union Risk-Based Supervisory Framework. It also includes PBGF stochastic (probability-based) modelling to assess adequacy of the fund and to manage SEPP risks more effectively. Additional investments include consumer communication initiatives and IT operations.

Third-party cost recoveries decreased by \$0.2 million, primarily due to lower recoveries from Financial Services Tribunal and Motor Vehicle Accident Claims Fund.

Amortization increased by \$2.1 million. This was primarily due to a digital transformation amortization cost increase of \$1.2 million. These expenditures are intended to achieve targeted investments in core regulatory and back-office technology.

The core regulatory digital transformation expenditure of \$6.0 million planned for FY2021-22 is a significant IT system investment that is focused on sector burden reduction and efficiencies in the future. The non-GAAP deferral of technology investment expenses is incurred in the current year but charged to sectors over five years to match the costs and benefits. This results in a \$4.8 million deferral. The investment will provide benefits to sector participants by improving digital reporting and return filing. This will also allow the accessing of real-time information and reduced cycle time on licence applications. The systems will allow FSRA to move to a principle-based regulator, replacing administrative and human capital effort with technology-based analytical and risk-based activities. FSRA's benefits include up-to-date secure, scalable platforms that will be the basis of process transformation.

The amortization for facilities expenses increased by \$0.9 million. That was due to the commencement of leasehold improvement amortization and the completion of the rent-free period at 25 Sheppard West facility. This enables FSRA to operate more effectively both in and out of the office.

FSRA will draw on the existing loan facility of approximately \$3 million in FY2021-22 for core regulatory systems and office re-location, resulting in \$0.1 million higher interest costs.

FSRA budgets total sector revenues showing a net increase of 0.7 per cent or \$0.7 million over the FY2020-21 budget. The variable sectors fee assessment component of these total revenues increases by 1.0 per cent. This increase is after accounting for the anticipated reduction in revenues for fixed fee/activity fees. The assessment fee increase is limited to 1.0 per cent by crediting \$3.9 million of FY2019-20 excess revenues over costs back to the sectors in FY2021-22.

Sector (\$000's)	Insurance								Pensions (Fixed and Variable)	Credit Unions (Variable)	Mortgage Brokers (Fixed)	Loans & Trusts (Variable)	Financial Advisor & Financial Planner	Total
Subsector	Auto Products	Health Service Providers (Fixed)	P&C Conduct	P&C Prudential Regulation	Total Auto/HSP/ P&C	Life & Health Conduct (Variable)	Life & Health Conduct (Fixed)	Total Life & Health						
F2021-2022 Revenue														
Activity Fees		3,327			3,327		5,627	5,627						8,954
Fee Assessment	19,360		10,234	524	30,118	4,395		4,395	26,105	15,551		106	2,500	78,775
Licensing Fees					-			-			12,332			12,332
F2021-22 Budget Rev	19,360	3,327	10,234	524	33,444	4,395	5,627	10,023	26,105	15,551	12,332	106	2,500	100,061
Direct Cost	10,411	1,875	5,966	306	18,558	2,563	3,172	5,734	15,220	9,843	7,664	62	1,409	58,489
Common Cost	9,563	1,452	4,619	237	15,871	1,984	2,456	4,440	11,783	6,288	5,933	48	1,091	45,454
F2021-2022 Cost	19,974	3,327	10,586	542	34,428	4,546	5,627	10,174	27,003	16,132	13,597	109	2,500	103,943
Recovery Over/(Under)	(614)	-	(352)	(18)	(984)	(151)	-	(151)	(898)	(581)	(1,266)	(4)	-	(3,882)
Funding from F19-20 Excess Revenues Over Costs	614	-	352	18	984	151	-	151	898	581	1,266	4	-	3,882
F2020-21 Budget Revenue	20,668	4,284	11,532	211	36,694	2,380	5,679	8,059	27,074	13,453	13,457	57	599	99,393
Revenue Variance Fav/(Unfav)	(1,308)	(957)	(1,298)	314	(3,250)	2,015	(52)	1,963	(968)	2,098	(1,125)	49	1,902	668
	-6.3%	-22.3%	-11.3%	148.9%	-8.9%	84.6%	-0.9%	24.4%	-3.6%	15.6%	-8.4%	86.7%	317.7%	0.7%
F2020-2021 Cost	20,112	5,278	11,735	214	37,339	2,422	5,779	8,201	27,549	13,690	11,957	58	599	99,393
Cost Variance F21-22 vs F20-21 Fav/(Unfav)	139	1,951	1,149	(328)	2,911	(2,124)	152	(1,973)	547	(2,442)	(1,640)	(52)	(1,902)	(4,551)
	0.7%	37.0%	9.8%	-153.0%	7.8%	-87.7%	2.6%	-24.1%	2.0%	-17.8%	-13.7%	-89.8%	-317.7%	-4.6%

2022-23 Plan

The FY2022-23 plan indicates expenses \$2.6 million higher than the FY2021-22 Board-approved budget. Salaries and benefits increase \$2.5 million due to the requirements of the collective agreements. The investment of seven new full-time equivalents (in FY2022-23 will provide FSRA the necessary resources to build supervisory capacity to oversee the life agents and MGAs. This is offset by \$0.9 million FTE efficiencies resulting from digital transformation investments.

The amortization expense increase of \$2.1 million is driven by digital transformation and operating investments in current and prior years.

The \$2.5 million of FY2019-20 excess revenues over costs will be used to reduce the FY2022-23 fee assessment.

2023-24 Plan

The FY2023-24 plan indicates expenses \$3.4 million higher than the FY2022-23 plan. Salaries and benefits increase \$1.4 million due to the requirements of the collective agreements. The investment of six new FTE in FY2023-24 will continue providing FSRA the necessary resources to build supervisory capacity to oversee the life agents and MGAs.

Through the core regulatory digital investments, FSRA will realize efficiencies of \$0.9 million in salaries and benefits. FSRA will continue to seek efficiencies through operational effectiveness and technology to potentially mitigate future FTE growth.

The amortization expense increase of \$2.0 million is primarily due to the amortization of core regulatory digital investments in current and prior years.

Capital

The FSRA capital program is aligned with its strategy of reducing regulatory burden and improving the effectiveness of regulation. Consistent with FSRA's priorities, significant investments in technology and processes are included. FSRA's FY2020-21 priorities include reviewing legacy guidelines, processes and technology that FSRA has inherited. Therefore, FSRA expects the capital program to evolve significantly as it determines a more detailed strategy and plans for a technology-enabled regulatory transformation.

	Investment F2020-21	F2021-22 Budget	F2022-23 Plan	F2023-24 Plan
(\$000's)				
Software	240	430	400	400
Computer hardware	850	1,143	1,100	1,100
25 Sheppard - Renovation	11,945			
25 Sheppard - Furniture	500			
25 Sheppard - Data Centre and IT set up	470			
	12,915			
Digital Transformation	170			
Capital Assets - In Year/Prior Years	14,175	1,573	1,500	1,500
25 Sheppard built-out amortized over 10 years (term of lease)				
Hardware - amortized over 3 years				
All other assets - amortized over 5 years				

FSRA will be making significant investments in core system digital transformation over the next few years. There will be a recovery of this investment from the sectors over a rolling five-year period, peaking in FY2024-25, in of \$7.2 million. The schedule below estimates the FY2021-24 investment in IT and how it will be recovered from the sectors through budgeted costs.

(\$000's)	F2020-21 Budget	F2021-22 Budget	F2022-23 Plan	F2023-24 Plan
Digital Transformation	3,681	6,021	9,200	9,000
Workday	850			
Total Operating Investments	4,531	6,021	9,200	9,000
Amortization				
From F2020-21	906	906	906	906
From F2021-22		1,204	1,204	1,204
From F2022-23			1,840	1,840
From F2023-24				1,800
From F2024-25				
Total Amorization	906	2,110	3,950	5,750

Cash Flow and Borrowings

The following chart illustrates FSRA's cash flow and borrowings through FY2023-24. The cash flow statements reflect the funding provided through the MOF/OFA for start-up and other identified requirements, including capital funding, and is illustrated below.

	F2021-22 Budget	F2022-23 Plan	F2023-24 Plan
(000's)			
Cash inflow from operations	\$ 5,333	\$ 8,948	\$ 13,308
Operating investments	(6,021)	(9,170)	(8,967)
Capital investments	(1,573)	(1,573)	(1,573)
	(7,594)	(10,743)	(10,539)
Net increase / (decrease) in borrowing	(419)	(3,623)	(3,623)
Net decrease in cash flows	(2,680)	(5,418)	(855)
Cash balance - beginning of year	57,472	54,792	49,374
Cash balance - end of year	\$ 54,792	\$ 49,374	\$ 48,520

The ending cash balances above have been adjusted to reflect the collection of fees in advance of the start of the next fiscal year (i.e., fees for a fiscal year will be collected in February/March before the fiscal year begins).

Debt repayment is amortized over 17 to 20 years with the objective that all loans mature in approximately 20 years from June 2019 at interest rates between 2.8 per cent and 3.4 per cent. The following table summarizes anticipated borrowings.

(000's)		
Initial Loan Draw	\$27,000	
Additional draw by March 31, 2019	13,000	
Loan draw at March 31, 2019	40,000	Amortized over 20 years
Anticipated 2019-20 Draw	6,853	Amortized over 19 years
Projected 2020-21 Draw	4,500	Amortized over 18 years
Projected 2021-22 Draw	3,000	Amortized over 17 years
Total	<u>\$54,353</u>	

Excess cash may be used for debt repayment where deemed appropriate.

Investing in People and Talent

FSRA is committed to building a consistently positive employee experience and fostering a principle-based, inclusive and strong culture. Comprehensive human resources policies, approaches and supports will continue organizational development. This will help FSRA to attract and retain talented, engaged and energized staff aligned with the organization's vision and values.

Staffing Information

Growth in FTEs⁴, discussed above, will provide FSRA the necessary resources to build supervisory capacity to oversee the life agents and other activities. Staff levels stay consistent until FY2022-23 when FSRA begins to realize efficiencies from IT investments.

Staffing Projection	FY 2021-22	FY 2022-23	FY 2023-24
Projected FTEs	558	553	549

Staffing, Human Resources, and Compensation Strategy

FSRA continues to build and deliver human resources (HR) programs and services to support its transformative people strategy in alignment with the business strategy and priorities.

Key initiatives include:

Culture Advancement

- Developing HR programs that measure and build employee engagement.
- Creating a cross-functional committee that champions diversity, inclusion and equity.
- Placing an overall focus on developing a collaborative and innovative culture.

Investment in Talent

- Developing and refining recruitment processes, including branding and visual identity.

⁴ FTE stands for full-time equivalent and refers to the number of hours considered full-time.

- Developing an approach to succession planning for executive and management positions.
- Providing a comprehensive onboarding program.
- Creating a learning and development framework and programs to align with organizational priorities.

Building Strong Foundations

- Developing a bargaining strategy for the first round of FSRA collective agreements.
- Developing a Workday (Workday is a financial and human capital management software) roadmap for Human Capital Management, Payroll, Talent, Learning and Recruitment enhancements, and developing a new functionality in alignment with the strategic priority to modernize systems and processes across the enterprise.

Compensation Strategy and Summary of Staffing Numbers

For non-union and management staff, FSRA has a salary administration policy and guidelines based on five principles:

- fiscal responsibility, governance, compliance with all applicable legislation and accountability;
- alignment with organizational mandate, strategic directions and values;
- value of the total compensation package;
- external competitiveness and internal equity; and consistency balanced with flexibility in compensation program design and application

FSRA determines compensation for designated executives in accordance with the *Broader Public Sector Executive Compensation Act, 2014* (BPSECA) and FSRA's Executive Compensation Framework, approved pursuant to the BPSECA in 2018.

A benchmarking exercise comparing our positions against same or similar positions in other broader public sector organizations, and establishing compensation levels for those executive positions was completed prior to launch when establishing the Executive Compensation Framework.

In accordance with Bill 124, *Protecting a Sustainable Public Sector for Future Generations Act, 2019*, FSRA's three-year moderation period for management/excluded staff started in FY2019-20 and will continue to the end of FY2021-22. FSRA will engage in bargaining with both bargaining units between 2021-2022 and will prepare to implement the three-year moderation period at that time.

In addition to its compensation programs, FSRA provides a traditional suite of benefits to its full-time equivalents (FTEs) and to casual (part-time) employees that meet specific thresholds. These benefits are 100 per cent employer paid. Additionally, employees are eligible to participate in a suite of optional benefits at their own expense. FSRA also offers programs for short- and long-term disability as well as a comprehensive Employee & Family Assistance Program.

FSRA has a headcount⁵ of 561 positions (Table 3). This includes active staff plus position vacancies that FSRA expects to fill during the fiscal calendar year.

- Staff include management, non-union and bargaining-represented employees (the latter accounts for approximately 68 per cent of the workforce).
- As a result of the transfer of FSCO from MOF, FSRA inherited Ontario Public Service collective agreements due to successor rights. With consolidation, FSRA now has two collective agreements: Ontario Public Service Employees Union and the Association of Management, Administration and Professional Crown Employees of Ontario.

⁵ Headcount refers to the number of employees working in a company. With headcount, each individual counts as "one," regardless of the number of hours worked. FTE stands for full-time equivalent and refers to the number of hours considered full-time.

Table 3: Workforce Management (Data as of Sept 22, 2020)

Total Headcount	2020/21 Headcount
Auto/Insurance Products	34
Credit Union and Prudential	37
Licensing and Market Conduct	112
Pensions	86
Legal and Enforcement	49
Policy	62
Public Affairs	33
Project Management Office & Facilities	28
Finance	31
Human Resources	17
Information Technology	53
Risk Management	9
Office of the CEO	10
Grand Total	561

Initiatives Involving Third Parties

FSRA is a participating member of several other forums, including:

- Canadian Automobile Insurance Rate Regulators (CARR);
- Canadian Association of Pension Supervisory Authorities (CAPSA);
- Canadian Council of Insurance Regulators (CCIR);
- Canadian Insurance Services Regulatory Organizations (CISRO);
- Credit Union Prudential Supervisors Association (CUPSA);
- International Association of Insurance Supervisors (IAIS).
- General Insurance Statistical Agency (GISA);
- Global Financial Innovation Network (GFIN);
- Joint Forum of Financial Market Regulators; and
- Mortgage Broker Regulators' Council of Canada (MBRCC).

Through these forums, FSRA works with other regulators on policies and rules that:

- support industry strength and stability across participating jurisdictions;

- enhance regulatory cooperation and reduce redundancies;
- develop rules that are integrated and more effective in achieving consumer protection public policy outcomes;
- promote innovation and economic growth by encouraging new business models that support changing consumer preferences, technology changes, and new entrants to the Ontario market; and,
- enhance the protection of consumers of financial products and services, and the effective implementation of financial consumer protection frameworks, by promoting robust and effective supervisory standards.

FSRA's National Regulatory Coordination Branch supports these outcomes by:

- providing secretariat services to CAPSA, CCIR, CISRO, GISA and MBRCC; and
- working collaboratively with the secretariat of the Canadian Securities Administrators on the activities of the Joint Forum of Financial Market Regulators.

Through these bodies, FSRA is engaged in several initiatives with third parties including, but not limited to, the following examples:

Canadian Council of Insurance Regulators (CCIR) Annual Statement on Market Conduct (ASMC) Database

The ASMC was introduced by CCIR in 2017 to collect information from insurers across Canada related to their governance, practices, policies and treatment of customers. The requirement to complete and file the ASMC is based on the authority of each provincial and territorial insurance regulator within their jurisdiction. The information collected has facilitated a better understanding of the market for regulators and assisted in proactively identifying potential risks to ensure insurance customers are being treated fairly.

Through a service agreement with CCIR members, including FSRA, the Autorité des marchés financiers acts as service provider with regard to the receipt, storage, aggregation and reporting of market conduct data collected through the ASMC. The initial term expires March 28, 2022, and the agreement allows for an extension of one-year.

CCIR/Canadian Insurance Services Regulatory Organizations (CISRO) Canadian Insurance Regulators Disciplinary Actions (CIRDA) Database

The CCIR/CISRO CIRDA is a searchable database of published insurance disciplinary decisions in Canada. The

publicly accessible website enables consumers and regulators to search individuals and firms that have been the subject of enforcement action by insurance regulators in Canada, including FSRA.

FSRA is a member of both CCIR and CISRO, and FSRA representatives serve on the executive committee of both organizations. FSRA is well positioned to monitor/evaluate the performance and to assess the continuing alignment of these third-party initiatives with FSRA's regulatory objectives.

FSRA/Canada Revenue Agency (CRA) Pension Plan Joint Filing Agreement

The Pension Plan Joint Filing Agreement between FSRA and the CRA reduces regulatory burden to pension plan administrators by supporting a single annual pension plan filing, which meets the information needs of both agencies. The information is captured in the AIR, most notably in the Schedule A.

The AIR information shared includes plan details related to the plan registration number, plan name, plan and benefit type, reporting period and pension plan contact information. It also includes information relating to plan funding, membership, last actuarial valuation report filed and plan cessation or termination. The information is shared through an exchange of data files that are digestible by both FSRA and CRA systems and occurs daily or when an AIR is submitted to FSRA.

Communication Plan

FSRA is enhancing its internal and external communications function to support its regulatory and cultural transformation.

Plain Language

Readability is a key indicator of effective communications. Information that is clear, concise, and avoids jargon can promote a stronger understanding of FSRA's activities and goals.

FSRA is committed to providing public-facing materials that are written in plain language. Staff are trained on software that can simplify technical language in material aimed for general readership, shorten sentences, and has a consistent tone.

This focus will extend to forms. FSRA is currently reviewing them to improve navigation, incorporate best practices to increase completion rate, and reduce burden.

Stakeholder Engagement

Stakeholder engagement is a cornerstone of FSRA's approach to regulation. Stakeholder Advisory Committees (SACs), TACs, special purpose Standing TACs, and the CAP have all been established since FSRA's creation (Appendix C).

The SACs serve as the primary consultation bodies to the Board on

FSRA's priorities and budget and other matters, such as rule-making, as the Board deems appropriate. SACs are an important part of FSRA's stakeholder engagement process and complement the many sector specific ad hoc, special purpose, and standing working groups and advisory committees.

This year, FSRA formed additional committees including, in addition to the TACs mentioned above, a Mortgage Brokering Technical Advisory Committee and two topic-specific TACs in the life and health insurance sector. They will advise on the supervision of product distribution through MGAs and on increasing regulatory effectiveness with respect to segregated funds.

The CAP serves as an advisory body to FSRA and provides ongoing advice from a consumer perspective on proposed FSRA policy and regulatory changes. It plays an important role in fulfilling FSRA's mandate to protect the public interest in financial services in Ontario by ensuring that consumer and other public input and perspectives inform its regulatory direction and decisions.

Consumer Engagement

The Consumer Office undertakes consumer research and experience mapping and sets and executes the strategy for consumer engagement. The insights gathered are essential to the implementation of key priorities.

Key priorities include empowering and protecting consumers, such as auto insurance customers, through transparent disclosure of rate information, consumer disclosure improvements and consumer awareness initiatives. FSRA has also completed a Residents' Reference Panel to make recommendations to FSRA on automobile insurance regulation in Ontario.

FSRA will develop a strategic communications and marketing plan that supports consumer understanding and education. Work includes exploring digital strategies to do so on key topics that affect the non-securities financial services and pension sectors in Ontario.

FSRA is committed to safeguarding public confidence and trust in our financial institutions and regulated sectors.

Internal Communications

FSRA is committed to providing consistent and timely information to its employees and embraces open dialogue with employees through various channels.

As a result of COVID-19 and the transition to remote work, FSRA has employed new and improved technology to support business continuity and continued employee engagement.

FSRA has adapted its internal channels to replicate in-person activities, such as virtual staff town halls and virtual onboarding for new employees.

The latest technology will be used to support and communicate with remote employees throughout FY2020-2021 and expand the suite of virtual activities throughout the organization. This includes a new online learning and development platform and organizational announcements using multimedia.

External Communications

FSRA will continue to enhance the website launched in June 2019 to promote the authority as a credible, transparent and effective regulator, and enhance consumer confidence in the sectors regulated. The aim is to ensure that consumers and industry users can easily find, understand and apply the information that they seek.

To achieve this, FSRA will have a single website that incorporates best practices in user experience design, with an optimized search capability, and integrated content from the FSCO and DICO sites. The information will be written in plain language and incorporate *Accessibility for Ontarians with Disabilities Act* principles.

This will provide inclusive and accessible information on FSRA services to all stakeholders. Content is reviewed based on pre-defined criteria to ensure that only current, relevant and FSRA-madndated information is published.

FSRA conducts content research and testing to identify and meet the navigation needs of consumers and

industry stakeholders.

Once FSRA integrates all necessary content from FSCO and DICO, these sites will be decommissioned and archived within FSRA for reference.

Response to Expectations in Agency Mandate Letter

FSRA plays a vital function in regulating Ontario's non-securities financial services and pension sectors. Management and employees will continue to focus on the Board approved priorities, objectives and strategic direction. This will be consistent with FSRA's mandate and directions from the Minister, made in accordance with the legislative framework. Pursuant to the requirements of the Agencies and Appointments Directive, this represents the response to the Minister's letter setting out expectations for FY 2021-22.

FSRA is committed to working closely with MOF to achieve the desired outcomes within the regulated sectors and to nurture a high-performing organization that will deliver on ambitious plans. Pursuant to the FSRA Act, FSRA's mandate includes:

- fostering strong, sustainable, competitive and innovative financial services sectors;
- promoting stability and high standards of business conduct; and
- protecting the rights and interests of consumers, credit unions depositors and pension plan beneficiaries.

FSRA is dedicated to act in the best interest of the people of Ontario by finding more effective and efficient ways of delivering regulatory services to reduce regulatory burden and providing value for money. In every action, decision and expenditure, FSRA considers the interests of the taxpayer and the people of Ontario. This includes:

- competitiveness, sustainability and expenditure management;
- transparency and accountability;
- risk management;
- workforce management;
- data collection; and
- digital delivery and customer service.

We have, and will continue, to contribute to cross-sectoral burden reduction goals, improving regulatory efficiency and effectiveness across sectors, and supporting government reform initiatives for Ontario's financial services and pension sectors. FSRA will continue to focus on delivering the above priorities to foster strong, sustainable, competitive and innovative non-securities financial services and pension sectors.

Information Technology

FSRA is continuing to strengthen its core IT capabilities as it reviews and transforms its regulatory and supervisory processes to be a more effective and efficient regulator. This builds on the foundation FSRA established in 2019, including: a secure and stable data centre; efficient and effective back-office systems; a combined IT workforce made up of previous regulatory agencies' staff; a cybersecurity roadmap; and a core regulatory digital transformation blueprint.

The goal is to establish cost-effective, modern, secure and flexible technology platforms to support these renewed processes. This will allow FSRA to be more responsive and more adaptable to changing regulatory needs.

Modernizing FSRA's IT systems is important for several key reasons:

- Reducing reliance on outdated legacy systems that are no longer supported and cannot be updated, thus reducing technology and operational risks and improving cybersecurity.
- Streamlining and automating processes, which will reduce manual processing, lower operating costs and improve turnaround times for regulatory processes such as licence issuance. These modern systems, with workflow capabilities and business rules engines, are

expected to enable reduced processing times from weeks to real-time.

- Providing better access to information and transparency on status and outcomes of requests. This will happen for both regulated entities and consumers via digital channels and through the service centre.
- Reducing the time and effort required to file, retrieve and analyze information.
- Reducing error rates and rework by employing effective data management practices and automating validation processes.

Modernizing core regulatory processes and systems work has begun with the development of a digital transformation blueprint. It aligns processes, data, technology and stakeholder interactions with FSRA's business vision and priorities.

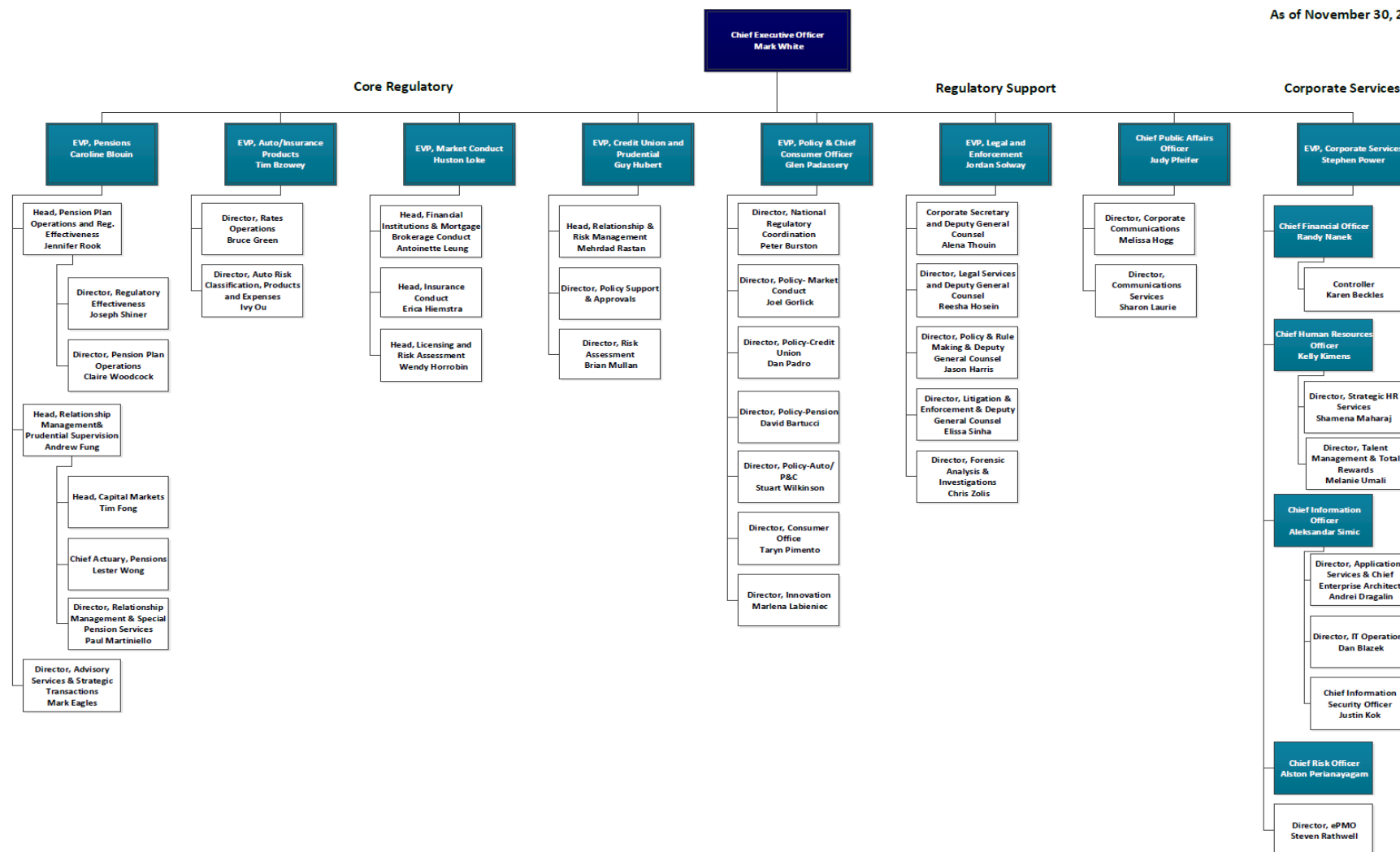
As FSRA progresses on this roadmap, the initial focus is on procuring and onboarding key applications and technology platforms, aligning the IT operation model, and building foundational technology and data components. Achieving fully digital, integrated and flexible technology and processes will be a multi-year and multi-million-dollar journey. In the first quarter of FY2021-22, FSRA will consult with stakeholders and sectors on key

decisions and priorities as it looks to increase regulatory efficiency and effectiveness and reduce regulatory burden.

FSRA is implementing a cybersecurity program consistent with the approved cybersecurity roadmap. This program leverages a recent third-party cybersecurity assessment and industry best practices in prioritizing initiatives that minimize FSRA's cybersecurity risks. FSRA's approach is aligned with National Institute of Standards and Technology Cybersecurity Framework, a leading cybersecurity risk management framework.

Appendix A: Organization Chart

As of November 30, 2020



Appendix B: Service Standards

Sector	Service	Standard	Target %	Stretch Target %
Credit Unions	Regulatory approvals	All credit union regulatory applications processed within 30 days after all required information received.	90%	100%
	Member/public inquiries	Telephone and email inquiries responded to or acknowledged within 1 business day.	95%	100%
	Examination Reports	Final Examination Report or Interim Examination Report to be provided to the Credit Union no later than 60 business days after the examination.	65%	100%
Auto Insurance	Filing	Percentage of Private Passenger Auto (PPA) Standard filings reviewed and decision made within 25 business days.	100%	N/A
	Filing	Percentage of non-PPA Minor filings reviewed and decision made within 25 business days	85%	TBD
	Filing	Percentage of Major rate filings reviewed and decision made within 45 business days.	90%	TBD
	Filing	Percentage of Underwriting Rules, Endorsement and Form Filings reviewed, and decision made within 30 business days.	80%	TBD
Pensions	Inquiries	Inquiries (plan-specific, non-plan specific and general) will be responded to within 45 business days.	90%	100%
	Application	Defined Benefit Plan wind-up applications will be reviewed and a decision will be made within 120 business days.	90%	95%
	Application	Defined Contribution plan wind-up applications will be reviewed and a decision will be made within 90 business days.	90%	95%
Life and Health Insurance, P&C Insurance, HSP, Mortgage Brokering, Credit	Complaints-Sector	FSRA will acknowledge complaints in writing within 3 business days of receipt provided that the reply information is available.	90%	100%
	Complaints-Sector	Within 120 days, complaints containing all* available information will be	80%	85%

Sector	Service	Standard	Target %	Stretch Target %
Unions, Loan & Trust Corporations		assessed and actioned for a range of possible outcomes. This is inclusive of escalation to other areas of FSRA, transfer to third-party dispute organizations, warning, and caution letters, and closed with no action.		
	Complaints-Sector	Within 270 days, complaints containing all* available information will be assessed and actioned for a range of possible outcomes. This is inclusive of escalation to other areas of FSRA, transfer to third-party dispute organizations, warning, and caution letters, and closed with no action.	95%	98%
Mortgage Brokering, Life and Health Insurance	Licensing - Individuals	Licenses will be issued 10 days from receipt of a complete application (complete, with payment, and no suitability issue identified during the application review process).	80%	90%
	Licensing - Individuals	Applicants who have submitted incomplete licensing applications (missing information, payment, qualifications, or documents) will be informed that their application is incomplete within 10 business days of receipt.	80%	90%
	Licensing - Individuals	Applicants submitting licensing applications where a suitability issue is identified, will receive an email advising the contact information for the assigned Licensing/Registration Specialist. They will be contacted within 10 business days of the email, or the license will be issued.	80%	90%
Enterprise	Phone General Inquiries	FSRA will respond to general questions when calls are received. Complex questions and complaints will be forwarded to the appropriate area to log, investigate, and respond.	90%	98%
	Phone General Inquiries	Calls that are received through voicemail will be acknowledged within 1 business day.	90%	98%

Sector	Service	Standard	Target %	Stretch Target %
	Contact Centre			
	Email General Inquiries Contact Centre	Emails received through the Contact Centre will be acknowledged within 1 business day and a response sent within 3 business days. For complex matters, FSRA may request additional information. These requests may take longer for a formal response.	90%	98%
	Accessible Formats	FSRA will respond within 5 business days to a requestor of web content in an accessible format. Following discussions with the requestor, FSRA will provide the agreed-upon web content (excluding online applications) in an accessible format within 5 business days.	90%	95%
	Accessible Formats	FSRA will respond within 5 business days to a requestor of a print publication in an accessible format. Following discussions with the requestor, FSRA will provide the agreed-upon publication material in an accessible format within 5 business days.	90%	95%
	Website Response	All inquiries directed to the Web Manager email account will be concluded and/or responded to within 5 business days.	95%	100%

Appendix C: FSRA Stakeholder Engagement Committees

Sector	Stakeholder Advisory Committees (SACs)	Standing Technical Advisory Committees (STACs)	Technical Advisory Committees (TACs)	Advisory Panels
Property and Casualty/ Auto Insurance	Property and Casualty/Auto Insurance Health Service Providers		Technical Advisory Committee for Transforming Auto Insurance Rate Regulation Technical Advisory Committee for Auto Insurance Data and Analytics Strategy	Consumer Advisory Panel
Credit Unions	Credit Unions			
Life and Health Insurance	Life and Health Insurance		Distribution Channels that Rely on MGAs Segregated Funds	
Mortgage Brokering	Mortgage Brokering	Mortgage Brokering	Mortgage Brokering Technical Advisory Committee	
Pensions	Pensions	Defined Benefit Single Employer Plans Advisory Committee Defined Contribution Plans Advisory Committee Multi-Employer Pension Plans Advisory Committee Public Sector Pension Plans Advisory Committee	Technical Advisory Committee for Identifying and Strengthening the Supervision of Actively Monitored Plans Technical Advisory Committee for Missing Members in the Pension Sector Technical Advisory Committee for Asset Transfers Technical Advisory Committee for Family Law Pension Matters Technical Advisory Committee for Defined Contribution	Retiree Advisory Panel (Pensions)